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Attorney for Plaintiff,

LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

CARY TABORA AND SCHULYER
WHETSTONE,

Defendants.

Case No. 3:11-CV-00651-IEG -JMA

**DECLARATION OF BRIAN DUNLAP IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION AND
IMPROPER VENUE**

Judge: Hon. Irma E. Gonzalez

I, BRIAN DUNLAP, DELCARE:

1. I am over the age of 18 and am a resident of the State of Nevada.

2. I have personal knowledge of the facts herein, and if called as a witness, could testify competently thereto.

3. I am employed as the Chief Operating Officer by the Plaintiff in Las Vegas, Nevada. My work location is in Las Vegas, Nevada.

4. I have access to the membership records for CorbinFisher.com

5. I reviewed those business records and have confirmed that Mr. Cary Tabora joined CorbinFisher.com on October 27, 2008, and his membership endured until October 17,

1 2010.

2 6. When Mr. Tabora joined the website, he used a billing address in Davie, Florida.

3 7. All members of the Corbin Fisher website are required to consent to the Terms
4 and Conditions of the website in order to join. In fact, it is technologically impossible to join the
5 site without doing so.

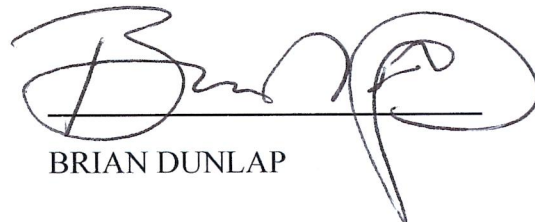
6 8. Attached to the Opposition as Exhibit L is a true and correct copy of the Terms
7 and Conditions as they substantially existed on October 27, 2008.

8 9. Sections 1.4, 5.2.2, 5.2.3 and 11.5.1 of this agreement have been unchanged since
9 October 27, 2008.
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11 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing
12 is true and correct.
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16 Dated: September 6, 2011 in Las Vegas, Nevada.

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BRIAN DUNLAP

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on September 6 2011.

Date: September 6, 2011.



Erika Dillon
Liberty Media Holdings, LLC
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