

1 Marc J. Randazza, Esq., CA Bar 269535
Randazza Legal Group
2 10620 S. Highlands Pkwy. #110-454
Las Vegas, NV 89141
3 888-667-1113
305-437-7662 (fax)
4 MJR@randazza.com

5 Attorney for Plaintiff,
6 LIBERTY MEDIA HOLDINGS, LLC

7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION
9

10)	Case No. 3:11-CV-00651-IEG -JMA
11	LIBERTY MEDIA HOLDINGS, LLC)	DECLARATION OF MARC J. RANDAZZA IN SUPPORT OF PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS FOR LACK OF JURISDICTION AND IMPROPER VENUE
12	Plaintiff,)	
13	vs.)	
14)	
15	CARY TABORA AND SCHULYER WHETSTONE,)	Judge: Hon. Irma E. Gonzalez
16	Defendants.)	
17	_____)		

18 I, MARC J. RANDAZZA, declare:

- 19 1. I am over the age of 18 and am a resident of the State of Nevada.
- 20 2. I have personal knowledge of the facts herein, and if called as a witness, could
21 testify competently thereto.
- 22 3. I made an offer to send a copy of the proposed Amended Complaint to
23 Defendant's counsel on July 7, 2011.
- 24 4. The email containing the above-referenced offer has not been produced to the
25 Court as it contains privileged settlement discussions pursuant F.R.E. 408. However, I will
26 produce it to the Court upon an order to do so or a waiver by both parties of their rights under
27 F.R.E 408.

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1 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing
2 is true and correct.

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5 Dated: September 6, 2011 in Las Vegas, Nevada.

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MARC J. RANDAZZA

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CERTIFICATE OF SERVICE

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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
4262 Blue Diamond Road #102-377
Las Vegas, NV 89139
erika@libertymediaholdings.com