

1 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
2 FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT  
3

4 BRUCE J. KELMAN  
GLOBALTOX, INC.,

Plaintiffs,

5 v.  
6

7 SHARON KRAMER, and

8 DOES 1 through 20, inclusive,

9 Defendant.  
10

)  
) Case No. GIN044539  
)

)  
) DECLARATION OF  
) PAUL L. HAYNES  
)

)  
) assigned for all purposes to Hon.  
) Michael B. Orfield, Department 28  
)  
)  
)

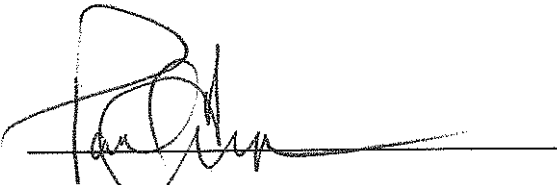
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12 I, Paul L. Haynes, under penalty of perjury under the laws of the State of California, hereby  
13 give this declaration for consideration in connection with the hearing on April 11, 2008.

14 1. I and my family were plaintiffs in a toxic mold case tried in Oregon in February and  
15 March 2005, and we received a favorable verdict. Mr. Kelman testified for the defense in that trial.

16 2. For the sake of clarification, I did not post anything regarding the trial or Mr. Kelman on  
17 any chatboard and was not the author of the chatboard posting to which Ms. Kramer refers in her  
18 declaration dated January 24, 2008. I do not know who did.

19 3. My wife, Renee, answered a phone call from Ms. Kramer a few days after our verdict  
20 asking about the Kelman testimony. My wife was not in the courtroom during the testimony so she  
21 gave the phone to me. It was a short phone call in which I described the testimony as I saw it. I did  
22 not use the word "lie" or "reversed" in my description. I encouraged her to speak to our attorney  
23 before doing anything. He subsequently advised her to wait for the transcripts before releasing any  
24 press release. I did not provide any language for a press release, nor did I in any way encourage her  
25 to write one. I have had no communication with her since that phonecall.

1 Dated this 19th day March, 2008, in Spokane, Washington.

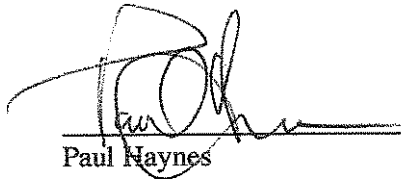
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5 PAUL L. HAYNES  
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CERTIFICATE OF SERVICE

I certify that I served the attached by US Mail to the following this 19th day of March, 2008.

Lincoln D. Bandlow  
1880 Century Park East  
Los Angeles, CA 90067

Keith Scheuer  
4640 Admiralty Way, Suite 402  
Marina Del Ray, CA 90202



Paul Haynes