## SUPERIOR COURT FOR THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT

GLOBALTOX, INC.,	Case No. GIN044539
Plaintiffs, ) )	DECLARATION OF RENEE J. HAYNES
v.	
SHARON KRAMER, and )	assigned for all purposes to Hon. Michael B. Orfield, Department 28
DOES 1 through 20, inclusive,	•
Defendant.	

- I, Renee J. Haynes, under penalty of perjury under the laws of the State of California, hereby give this declaration for consideration in connection with the hearing on April 11, 2008.
- 1. In February and March 2005, I and my family were plaintiffs in a toxic mold case tried in Clackamas County, Oregon. Mr. Kelman was a defense witness.
- I read Sharon Kramer's declaration dated January 24, 2008 for the first time on March 15,
   2008.
- 3. I state, for the record, that I posted nothing regarding the trial or Mr. Kelman on Toxlaw.com or any chatboard, and was not the author of the chatboard posting to which Ms. Kramer refers. I do not know who made the posting.
- 4. I received a phone call from Ms. Kramer a few days after our verdict asking about the Kelman testimony and had nothing to offer as I did not witness the testimony. I was out of the courthouse during Mr. Kelman's testimony taking our expert witness, Dr. Vincent Marinkovich, to the airport to catch his flight home. Nothing in my conversation with Ms. Kramer could have possibly been of use to her in her wording of her press release, nor did I in any way encourage her

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to write one.

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

RENEE J. 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

Renee Haynes

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