

EXHIBIT A

ORIGINAL

Affidavit of Blair Chintella

I, Blair Chintella, do solemnly affirm under the penalties of perjury that the information contained in this document or statement is the truth:

1.

My name is Blair Chintella and I currently reside in the State of Georgia.

2.

I am an attorney who is licensed to practice law in the State of Georgia.

3.

I have had multiple clients over the last few years who were accused of copyright infringement, and I have communicated with John Steele and/or Paul Duffy and/or and Mark Lutz regarding these clients.

First Conversation with Female Answering the Phone

4.

On March 7, 2013, at approximately 3:32 PM, I received a voice mail message from someone who identified themselves as Tommy Labriola ("Tommy") stating that he was returning a phone call on behalf of an "attorney Steven Goodhue,"¹ and that he (Tommy) could be reached at "800-380-0840."

5.

Prior to receiving this phone call, I had never heard of a person named Steven Goodhue or a person named Tommy Labriola.

6.

On March 7, 2013 at approximately 3:35 PM, I called 1-800-380-0840 and a female voice answered the phone saying: "Law office, how may I help you?"

7.

I told her that I was returning a phone call from Tommy who said that he was calling on behalf Steven Goodhue. In response she said, "We have Mr. John Steele in the office or Mark Lutz, so let me see if maybe they might know what it's in reference to."

8.

¹ Initially, I thought that the message said "Goodview" rather than Goodhue.

I asked the female if this was the office of John Steel and Mark Lutz and she said, "That's the office you're calling to right now, so that's why I'm going to see if they know anything about it because I don't know of a Tommy here."

9.

I asked a second time what office I was calling and she responded: "This is the offices of John Steele. We have an attorney Mark Lutz also in the office." She also said that their firm does "intellectual property litigation."

10.

I asked again to speak with Tommy and she said that she would try to find out who he was, and she then put me on hold.

First Conversation with "Tommy"

11.

After being on hold for approximately two minutes, someone answered the phone and identified himself as Tommy.

12.

I told him that I was returning a call from someone named Tommy. Tommy responded by saying that "somebody" left a voice mail message with Steven "about a letter that they received from their internet service provider" and that he (Tommy) was returning the phone call.

13.

I said that I was "confused" and asked if he was calling on behalf of Steven Goodhue and Tommy said, "Yeah, he's my boss."²

14.

I said that nobody from my number called trying to reach an attorney named Steven Goodhue and Tommy said, "That's odd. This number showed up on our caller ID."

15.

I asked "what firm is this?" and Tommy said "This is Livewire Holdings."

16.

² I was confused because up until this point I thought that Tommy might have been trying to reach a Steven Goodhue...I just wasn't sure.

I asked if Livewire Holdings was a law firm and Tommy said that they were not, but that “we have attorneys working for us.”

17.

Tommy asked how he could help me. I said that I didn’t know because “you guys called me.” I also said that if “John Steele,” “Mark Lutz” or “Paul Duffy” want to talk with me why they didn’t just call me.³ In response, Tommy said “I don’t know who any of those individuals are.”

18.

I asked to be transferred back to the secretary. In response, Tommy said: “This is Tommy. I’m Vice President here, so I don’t think my receptionist is going to be able to help you.”

19.

I explained a second time that I hadn’t called anyone named Steven Goodhue. Tommy said “hold on a second” and he put me on hold. I was hung up on approximately two minutes later at approximately 3:42 PM on March 7, 2013.

Second Conversation with Female Answering the Phone

20.

After being hung up on, I called 1-800-380-0840 again on March 7, 2013, and a female answered the phone saying “Law offices.”

21.

I said that I was trying to reach Tommy and she said, “Hold on just a second, he’s on another call.”

Second Conversation with “Tommy”

22.

Approximately one minute and thirty second later a person came on the line and said “This is Tommy.”

³ I said this specific comment because, at this point, I was still trying to figure out why someone named Tommy was calling me from a number which, at least according to the female who answered the phone, belongs to the law offices of John Steele. I have had clients involved in cases where John Steele and/or Paul Duffy and/or Mark Lutz have communicated directly, so I was wondering why they were possibly having Tommy contact me instead of calling me themselves...

23.

I asked Tommy who the person was that he said I had called, and he said that "I'm guessing the attorney Steven Goodhue. He's an attorney of ours in Phoenix."

24.

I said that I had never called an attorney Steven Goodhue, he said that it was his "mistake," and we ended the conversation.

25.

Everything that is in quotation marks in this affidavit is verbatim and not a paraphrase of what was spoken.

26.

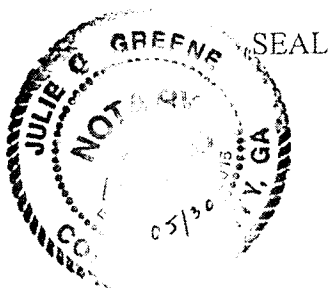
I made a record of the above conversations and quotes either as they were occurring or shortly thereafter (within 1 minute).



Blair Chintella

State of Georgia
County of Coffee

Sworn to and subscribed before me this 8 day of March, 2013, Blair Chintella, whose identity I verified in the form of a Georgia driver's license.



Notary Signature: Julie C. Greene

Printed Notary Name: Julie C. Greene

Affidavit of Blair Chintella

I, Blair Chintella, do solemnly affirm under the penalties of perjury that the information contained in this document or statement is the truth:

1.

I am an attorney who is licensed to practice law in the State of Georgia. I currently represent the defendant in a case filed in the United States District Court for the Northern District of Georgia styled *AF Holdings, LLC v. Rajesh Patel*; 2:12-cv-00262.

2.

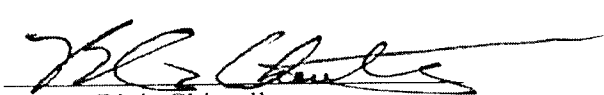
I have an e-mail address that is "bchintell1@gmail.com."

3.

The plaintiff's attorney in the above lawsuit is Jacques Nazaire and he has an e-mail address of "nazaire.jacques@gmail.com" and he and I have corresponded using these e-mail addresses.

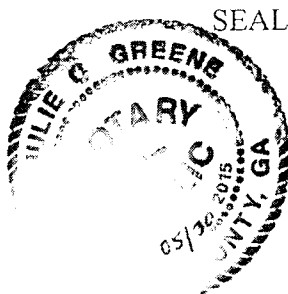
4.

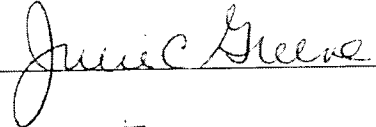
Attached to this affidavit are a true and correct copy of two e-mails: one from Jacques with a time/date stamp of "Mar 5, 2013 at 4:00 PM" and one from me with a time/date stamp of "Mar 5, 2013 at 4:39 PM."


Blair Chintella

State of Georgia
County of Coffee

Sworn to and subscribed before me this 8 day of March, 2013, Blair Chintella, whose identity I verified in the form of a Georgia driver's license.



Notary Signature: 
Printed Notary Name: Julie C Greene.

Gmail - Re: Settlement

<https://mail.google.com/mail/u/0/?ui=2&ik=33fd3fe0fa&view=pt&q=naz>.



bbc-Master bbc-Account <bbc.master.acct@gmail.com>

Re: Settlement

Jacques Nazaire <nazaire.jacques@gmail.com>
To: Bchintel1 <bchintel1@gmail.com>

Tue, Mar 5, 2013 at 4:00 PM

Blair:

We are willing to set it aside. I will send you the stip. I just need time to do it. I am not in my office right now.

As far the motion,

1) Mr. Patel has no excuse for his default such as illness, or death in the family or that he never received the papers.
2) As for Alan Cooper, he appears to be a disgruntled employee who was probably not paid what he wanted to be paid and as such he is suing Mr. Steele. Regardless of whether Cooper was branded as a janitor or president of AF Holdings, he is what they deemed him to be. I would like to subpoena him and have him state under oath that he has never received a dime from John Steele, who has interest in AF. Mr. Cooper's allegations are alone not enough to create fraud.

In any event, I will send you the stip to withdraw the entry of default later. I will also call you so that we may discuss where these cases are going.

-Jacques

Gmail - Re: Settlement

<https://mail.google.com/mail/u/0/?ui=2&ik=33fd3fe0fa&view=pt&q=naz>.



bbc-Master bbc-Account <bbc.master.acct@gmail.com>

Re: Settlement

Bchintel1 <bchintel1@gmail.com>
To: Jacques Nazaire <nazaire.jacques@gmail.com>

Tue, Mar 5, 2013 at 4:39 PM

As far as the basis for setting aside the default, our clients obviously disagree. We don't think that it can only be set aside when there's something as serious as a death in the family, illness or not receiving the papers, etc....but send over the stipulation and I'll take a look at it so we can get the ball rolling on this thing...

Regarding Alan Cooper, if I understand you correctly: Alan Cooper was a disgruntled employee of AF Holdings who was paid by John Steele, because apparently Steele has an interest in the company, a company? When you say that he was what "they" deemed him to be I'm assuming that you're referring to Steele? So what was his actual position? Janitor? President? Anyhow, have you talked to Alan Cooper or who is giving you this information? Steele? Duffy? Gibbs?

Sincerely,

Blair Chintella
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404-579-9668
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