

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

|                  |   |                              |
|------------------|---|------------------------------|
| AF HOLDINGS, LLC | : | Case No.: 12-cv-1445 JNE-FLN |
|                  | : | Case No.: 12-cv-1446 JNE-FLN |
| Plaintiff,       | : | Case No.: 12-cv-1447 JNE-FLN |
|                  | : | Case No.: 12-cv-1448 JNE-FLN |
| v.               | : | Case No.: 12-cv-1449 JNE-FLN |
|                  | : |                              |
| John Doe,        | : |                              |
|                  | : |                              |
| Defendant.       | : |                              |

**Declaration of Paul Godfread**

I am counsel for Alan Cooper in the above titled cases and state the following based on my personal knowledge:

1. The attached Exhibits A-L are true and correct copies of documents that are either public records pulled from the federal court PACER system, are documents that were delivered to me by the author or custodian of records.
2. Paul Hansmeier called me on September 9, 2013 to discuss pending motions in the miscellaneous case *AF Holdings v. Patel*. During that call, he offered to not sue me if I agreed to not handle any more cases relating to himself, Prenda Law, or any of Prenda Law's clients. He told me that he had been contacted by people who wanted to sue me based on actions I have taken in these cases and related cases and he believed such lawsuits would continue for as long as 10 years. He also stated that such lawsuits wouldn't be profitable for himself, his clients, or myself, and that they would cause serious problems for me personally and professionally. I declined to entertain his "offer" and told him I perceived such an "offer" as a threat of vexatious litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 20, 2013

By: s/ Paul Godfread  
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