

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

Case No. 07-21403-CIV-COHN/SELTZER

ANTONIO HERNANDEZ,
Individually and on behalf of all
others similarly situated,

Plaintiff,

v.

IGE U.S. LLC,
a Delaware corporation,

Defendant.

**DECLARATION OF BROCK J. PIERCE IN SUPPORT OF
DEFENDANT'S OPPOSITION TO CLASS CERTIFICATION**

I, BROCK PIERCE, hereby declare that:

1. I am Brock J. Pierce, the sole Managing Member and sole officer of the Defendant in this action, IGE U.S., LLC a/k/a Affinity Media Holdings, LLC ("IGE U.S."). I am over 18 years of age and competent to testify. I make this Declaration based on my personal knowledge, in support of IGE U.S.'s Opposition to Plaintiff Antonio Hernandez's Motion for Class Certification in the above-captioned lawsuit.

2. IGE U.S. is a limited liability company organized in April 2003 under the laws of Delaware. On or about July 2007, IGE U.S. changed its name to Affinity Media Holdings, LLC.

3. At one time IGE U.S. was engaged in multiple lines of business through multiple subsidiaries. One of those businesses related to the practice described in the Amended Class Action Complaint in this lawsuit as real money trading (or "RMT").

4. On or about April 5 2007, IGE U.S. sold substantially all of the assets related to (among other things) the RMT business to Atlas Technology Group, Inc. ("Atlas"). Atlas is not a party to this lawsuit. The sale was effectuated by means of a "Purchase Agreement," a copy of which has been produced to Plaintiff as part of this litigation.

5. On or about May 25, 2007, IGE U.S. transferred substantially all of its remaining assets to Affinity Media, Inc. Affinity Media, Inc. is not a party to this lawsuit. The sale was effectuated by means of a "Convertible Preferred Stock Purchase Agreement," a copy of which has been produced to Plaintiff as part of this litigation. As part of the transaction, IGE U.S. received approximately 10% of the common stock of Affinity Media, Inc.

6. Today, IGE U.S. consists solely of its stock holdings in Affinity Media, Inc. IGE U.S. is not engaged and does not employ anyone to engage in any form of RMT, "gold farming," "spamming," auctions or any of the other activities alleged in the Amended Complaint. IGE U.S. has no employees.

I declare under penalty of perjury for the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.



Brock Pierce

DATED: June 12, 2008