

**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.

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**DECLARATION OF BROCK J. PIERCE IN SUPPORT OF
DEFENDANT’S OPPOSITION TO PLAINTIFF’S MOTION TO COMPEL**

I, BROCK J. 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 to Compel and for Extension of Discovery Limits.

2. On or about April 5 2007, IGE U.S. sold substantially all of the assets related to (among other things) the real-money-trade (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. As part of that sale, IGE U.S. conveyed numerous computers, servers, and files (both hard copy and digital) to Atlas.

3. 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. In return, Affinity Media, Inc. received (among other things) certain computers, servers, and files (both hard copy and digital) from IGE U.S.

4. 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.

5. IGE U.S. does not own, operate or administer any web sites, including the web site "<http://www.ige.com>."

6. In furtherance of IGE U.S.'s discovery obligations in this lawsuit, I have turned over all documents in my possession that are (1) responsive to the document requests served on behalf of the Plaintiff in this case, or (2) relevant to the allegations in the Amended Complaint to counsel for IGE U.S. I understand that our attorneys have produced the non-privileged materials from those documents to Plaintiff in this lawsuit.

7. On or around June 30, 2007, my laptop computer was stolen from my hotel room in Las Vegas, Nevada. The laptop contained additional information potentially responsive to Plaintiff's discovery requests. I have been unable to recover the laptop, despite filing a report with the Las Vegas Metropolitan Police Department. A copy of the police report has been produced to Plaintiff as part of this litigation.

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: July 30, 2008