IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO: 1:10-cy-21951 Torres

Jesús Cabrera Jaramillo, in his individual capacity, and in his capacity as the personal representative of the estate of Alma Rosa Jaramillo,
Jane Doe, in her individual capacity, and in her capacity as the personal representative of the estate of Eduardo Estrada, and
John Doe, in his individual capacity,
Plaintiffs,
V.
CARLOS MARIO JIMÉNEZ NARANJO, also known as "Macaco," "El Agricultor," "Lorenzo González Quinchía," and "Javier Montañez,"
Defendant

DECLARATION OF LEE-ANNE MULHOLLAND IN SUPPORT OF PLAINTIFFS' MOTION TO ALTER OR AMEND JUDGMENT

- I, Lee-Anne Mulholland, declare as follows:
- 1. I am an attorney licensed to practice law before the State of California, and am admitted to practice in the Northern District of California. I am associated with the law firm of Wilson Sonsini Goodrich & Rosati P.C., counsel for Plaintiffs Jesús Cabrera Jaramillo, Jane Doe, and John Doe ("Plaintiffs"). I have personal knowledge of the facts set forth in this declaration.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of *Giraldo v. Drummond Co., Inc.*, No. 2:09-CV-1041-RDP, slip op. (N.D. Ala Mar. 8, 2012).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2012

By: _/s/ Lee-Anne Mulholland

LEE-ANNE MULHOLLAND

I, Julie C. Ferguson, am the ECF User whose identification and password are being used to file this Declaration of Lee-Anne Mulholland in Support of Plaintiffs' Motion to Alter or Amend Judgment. I hereby attest that Lee-Anne Mulholland has concurred in this filing.

Dated: April 10, 2012

By: /s/ Julie C. Ferguson
Julie C. Ferguson, Florida State Bar #93858
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Declaration of Lee-Anne Mulholland in Support of Plaintiffs' Motion to Alter or Amend Judgment was served by CM/ECF on April 10, 2012, on counsel or parties of record on the service list.

Hugo A. Rodriguez, Esq. 1210 Washington Avenue, Suite 245 Miami Beach, FL 33139 Email: hugolaw@aol.com

> /s/ Julie C. Ferguson JULIE C. FERGUSON