

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN W. FERRON,	:	
	:	
Plaintiff,	:	Civil Action No. 2:06-cv-322
	:	
vs.	:	Judge Frost
	:	
VC E-COMMERCE	:	Magistrate Judge Abel
SOLUTIONS, INC., <i>et al.</i>	:	
	:	
Defendants.	:	

**AFFIDAVIT OF JOHN W. FERRON**


I, John W. Ferron, hereby state under oath as follows:

1. I am over 18 years of age, and am otherwise competent to make this affidavit. The matters set forth below are based upon my own personal knowledge and, if called as a witness, I could and would testify competently thereto. I am providing this Affidavit in connection with the above referenced matter.

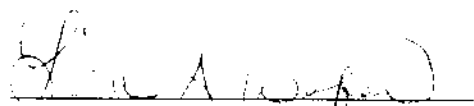
2. I am the Plaintiff in the above captioned matter.

3. On November 27, 2006, I listened to the telephone deposition conducted of one of Defendant's employees, Jazette Pester. During Ms. Pester's deposition, Ms. Pester testified that the Richters regularly travel hundreds of miles away from Defendant's corporate office to attend trade shows. Ms. Pester testified that one or both of the Richters have attended trade shows in New York, Las Vegas, San Francisco and Orlando.

4. Further affiant sayeth naught.

  
\_\_\_\_\_  
John W. Ferron

SWORN AND SUBSCRIBED TO BEFORE ME this 28<sup>th</sup> day of November, 2006.

  
\_\_\_\_\_  
Notary Public



LISA A. WAFER  
Attorney at Law  
Notary Public, State of Ohio  
My Commission Has No Expiration  
Section 147.03 R.C.