

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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GEORGE OUZOUNIAN, P/K/A MADDOX, and, JANE
DOE,

Index No: 656779/2017

Plaintiffs,

v.

**AFFIRMATION OF
SARAH M. MATZ**

DAX HERRERA P/K/A DICK MASTERSON,
FOUNDATION DIGITAL, LLC, GREG BOSER,
LOREN BAKER, CMGRP, INC., D/B/A WEBER
SHANDWICK, JOSHUA KAUFMAN, ASTERIOS
KOKKINOS, TREVOR BIRT, PATREON, INC., and
JORDAN COPE,

Defendants.

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SARAH M. MATZ, an attorney duly admitted to practice law before the Courts of the
State of New York, affirms the following to be true under the penalties of perjury:

1. I am a partner at the law firm of Adelman Matz P.C., attorneys for defendants
Dax Herrera (“Herrera”), Foundation Digital, LLC (“Foundation”), Greg Boser (“Boser”)
(collectively “Moving Defendants.”) As such I am fully familiar with the facts and
circumstances of this case based on my personal handling of this file.

2. This affirmation is submitted in support of Moving Defendants’ Motion to
Dismiss pursuant to CPLR §§ 3211(a)(8), 327, and 3211(a)(7).

3. Annexed hereto as **Exhibit 1** is a true and correct copy of Plaintiffs’ Summons
and Complaint, filed on November 6, 2017, which I retrieved from the NYSECF Docket.

4. Annexed hereto as **Exhibit 2** is a true and correct copy of the Affidavit of Service
on Boser as filed on November 30, 2017, which I retrieved from the NYSECF Docket.

5. Annexed hereto as **Exhibit 3** is a true and correct copy of the Affidavit of Service
on Foundation as filed on November 30, 2017, which I retrieved from the NYSECF Docket.

WHEREFORE, Moving Defendants respectfully requests that this Court grant Moving

Defendants' Motion to Dismiss, and for any such further relief as this Court deems just and proper.

Dated: January 2, 2018

/s/Sarah M. Matz
SARAH M. MATZ, ESQ.