

# Exhibit “B”

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

METH LAB CLEANUP, LLC,

Plaintiff,

v.

Case No. 8:14-cv-3129-T-26TBM

SPAULDING DECON, LLC and  
LAURA SPAULDING,

Defendants.

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**AFFIDAVIT OF BRAD TAYLOR IN SUPPORT OF PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT AND INCORPORATED MEMORANDUM OF LAW**

I, Brad Taylor, hereby certify pursuant to 28 U.S.C. §1746 and under penalty of perjury that the foregoing is true and correct:

1. I am over the age of eighteen (18) and competent to make this Affidavit.
2. I submit this Affidavit in support of Plaintiff's Motion for Partial Summary Judgment and Incorporated Memorandum of Law.
3. I have worked professionally in designing, developing, and marketing websites since February of 2002.
4. I have owned World Wide Website Design and Web Development Company since February of 2002.
5. I owned and used simplesitedesign.com from February of 2002 through July of 2004 and began owning and using OlympusWeb.com starting July of 2004 through the present.
6. As the owner and operator of OlympusWeb.com, I handle every aspect of internet based domains, including building custom websites using the latest programs and technology.

7. I use WordPress to drive web users to websites through search engine optimization (“SEO”).

8. I have thoroughly reviewed Defendants’ website, [www.methlabservices.com](http://www.methlabservices.com) (“Website”), including the publicly available coding and meta data of Defendants’ Website and webpages of the Website.

9. A “meta tag” or “metatag” is a tag in HyperText Markup Language (“HTML”), used to create web pages that is manually inserted into a webpage to describe the content and provide keywords for use by search engines.


10. A “meta tag” or “metatag” is not coding for the text on a webpage.

11. To all knowledge and belief, a “meta tag” or “metatag” is in addition to the text on a webpage and is extremely important in search engine optimizations (“SEO”) because SEOs place a high value on meta tags which determine the order of webpage listings when search engines, such as Google ®, are used to seek information on the Internet.

12. “Meta tags” or “metatags” require affirmative action to be placed on a website.

13. Upon review of Defendants’ Website, as early as April of 2014 and as recent as May 11, 2015, a company named WordPress was used by Defendants to allow them to add meta tags thus increasing the likelihood that Defendants’ Website would appear at the top of any search list when “meth lab cleanup” was searched by potential customers.

Dated: May 13, 2015.

  
Brad Taylor