

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Case No.: 8:14-cv-3129-RAL-TBM

METH LAB CLEANUP, LLC

Plaintiff,

v.

SPAULDING DECON, LLC and
LAURA SPAULDING,

Defendants.

SPAULDING DECON, LLC, a
domestic limited liability company,

Counter-claimant and
Third Party Plaintiff,

v.

METH LAB CLEANUP, LLC, a
foreign limited liability company,

Counter-defendant, and

JOSEPH MAZZUCA, individually, and
JULIE MAZZUCA, individually,

Third Party Defendants.

AFFIDAVIT OF LAURA SPAULDING

STATE OF FLORIDA

COUNTY OF Hillsborough

BEFORE ME, the undersigned authority, personally appeared Laura Spaulding, who,
being duly sworn, deposes and states:

I, Laura Spaulding, hereby certify pursuant to 28 U.S.C. § 1746 under oath and under penalty of perjury that the foregoing statements are true and correct to the best of my ability:

1. I am over the age of eighteen (18) years old and fully competent to make this Affidavit and the statements contained therein;
2. I submit this Affidavit in support of Defendants' Response in Opposition to Plaintiff's Motion for Partial Summary Judgment.
3. I am the owner and principal of Spaulding Decon ("Spaulding Decon") and I have been the owner and principal of the company since it was founded in 2005.
4. Among the services provided by Spaulding Decon, we have been engaged in the business of meth lab cleanup for many years.
5. I have hired all of the IT professionals who have provided services pertaining to our websites at all times.
6. I am familiar with the use of meta-tags and search terms that Spaulding Decon has used at various times over the years.
7. Since 2006, Spaulding Decon has continuously and consistently used the phrase "meth lab cleanup" to generally describe one of the key services provided by Spaulding Decon.
8. I am familiar with the composition of Spaulding Decon's websites at all times, including that which existed on January 26, 2012 and at all times since then.
9. I know and can attest that Spaulding Decon's use of "meth lab cleanup" as a meta-tag identifier of a key service we provide has been consistent and generally unchanged on any and all of Spaulding Decon's websites since before January 26, 2012.
10. Spaulding Decon has never used the phrase "Meth Lab Cleanup, LLC" as an identifying, meta-tag or descriptive text on any of our websites at any time.

- 11. Spaulding Decon entered into a settlement agreement ("Agreement") with Meth Lab Cleanup, LLC, to resolve the prior litigation between the parties.
- 12. Meth Lab Cleanup, LLC, made false statements in its Internet advertising and falsely obtained patents.
- 13. Spaulding Decon and I have not breached the Agreement and have complied with all of the requirements under the Agreement.
- 14. Spaulding Decon and I have not waived any of my rights under the Agreement, nor have we consented or acquiesced to any revisions to the Agreement.
- 15. I am making this submission under oath on this date, June 11, 2015.

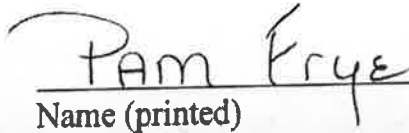
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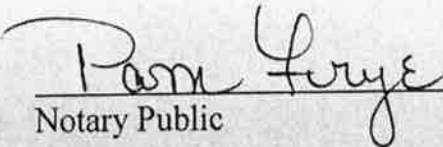
 Laura Spaulding

SWORN TO AND SUBSCRIBED BEFORE ME this 11 day of June,
 2015, by Laura Spaulding who is personally known to me and who did take an oath.
Provided ID





 Name (printed)



 Notary Public