

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

AMERICAN ENERGY
CORPORATION,

Plaintiff,

v.

AMERICAN ENERGY PARTNERS, LP,
et al.,

Defendants.

:
: CASE NO. 2:13-CV-00886-EAS-MRA
:
: Judge Edmund A. Sargus, Jr.
: Magistrate Judge Mark R. Abel
:
:
: DECLARATION OF
: VLADIMIR P. BELO
:
:
:
:

I, Vladimir P. Belo, state as follows:

1. I am over eighteen (18) years of age and am competent to testify to the matters set forth in the Declaration.

2. I am one of the attorneys of record for Plaintiff in this action. I submit this Declaration in support of *American Energy Corporation's Objection to Magistrate Judge's Plaintiff American Energy Corporation's Objection To Magistrate Judge's Discovery Dispute Conference Order (ECF No. 30) Issued On March 27, 2014* ("Objection") and for all other purposes permitted by law. I make this Declaration based upon personal knowledge or information obtained from documents produced by Defendants during discovery in this action.

3. Exhibit 1 attached to Plaintiff's Objection is a true and correct copy of the Magistrate Judge's Order, ECF No. 30, filed on March 27, 2014.

4. Exhibit 2 attached to Plaintiff's Objection is a true and correct copy of Plaintiff's March 19, 2014 discovery dispute conference letter to the Magistrate Judge and the exhibits attached thereto.

5. Exhibit 3 attached to Plaintiff's Objection is a true and correct copy of Defendants' discovery dispute conference letter to the Magistrate Judge, dated March 20, 2014, and the exhibits attached thereto.

6. Exhibit 4 attached to Plaintiff's Objection is a true and correct copy of an August 2013 advertisement of American Energy Partners in *Ohio Oil and Gas Magazine*, produced by Defendants to Plaintiff in discovery.

7. Exhibit 5 attached to Plaintiff's Objection is a true and correct copy of a press release dated February 3, 2014, regarding American Energy-Utica's acquisition of land, retrieved from the website AmericanEnergyPartners.com.

8. Exhibit 6 attached to Plaintiff's Objection are true and correct copies of organization charts of American Energy Partners and American Energy-Utica, produced by Defendants to Plaintiff in discovery, subject to the Court's Protective Order.

9. Exhibit 7 attached to Plaintiff's Objection is a true and correct copy of a document entitled "Roadshow Presentation," produced by Defendants to Plaintiff in discovery, subject to the Court's Protective Order.

10. Exhibit 8 attached to Plaintiff's Objection is a true and correct copy of what appear to be documents reflecting an advertising campaign of American Energy Partners and/or American Energy-Utica, produced by Defendants to Plaintiff in discovery on April 10, 2014, subject to the Court's Protective Order.

I declare, pursuant to 28 U.S.C. § 1746(2), under penalty of perjury that the foregoing is true and correct.

Executed on April 14, 2014.



Vladimir P. Belo