I, Victoria Hall, have personal knowledge to the facts stated herein and hereby declare as follows:

1. I am the attorney for Plaintiff Robert Jacobsen in this matter. I am submitting this Declaration in Support of the Administrative Motion to Amend 2 Memoranda in Opposition to Defendants’ Anti-SLAPP Motions.

2. Attached as Exhibit A is a true and correct copy of the top left hand portion of page B3 of the Washington Times, dated Tuesday, July 4, 2006.

3. Attached as Exhibit B is a true and correct copy of a memorandum from Horning
Brothers Corporation dated July 6, 2006.

4. Attached as Exhibit C is a true and correct copy of a memorandum from Horning Brothers Corporation dated July 10, 2006.

5. Attached as Exhibit D is a true and correct copy of a document from the Maryland Motor Vehicle Administration, showing my home address.

6. Attached as Exhibit E is a true and correct copy of a School/Work Form from Inova Health System, Inova Urgent Care, dated July 13, 2006.

7. Attached as Exhibit F is a true and correct copy of a note from Dr. Jamil A. Fayez, MD, dated July 16, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of July, 2006, in Rockville, Maryland.

By ________________________________
Victoria Hall
Hall Declaration Ex. A
MARYLAND

ROCKVILLE
Fire forces 200 from homes

About 40 people were staying in a shelter at Rockville High School yesterday after a fire and power failure early in the day forced residents out of an apartment complex.

About 200 people were evacuated from the Forest Apartments on Baltimore Road. There were no reports of any injuries. The fire damaged three buildings, and police were keeping people out of the apartment complex because power lines were still down.

HAVRE DE GRACE
Youths arrested at town carnival

Authorities made several arrests after a disturbance at Sunday night's Fourth of July carnival in Tydings Park.

Maj. John Van Gilder of the Havre de Grace police said the trouble broke out as the town's fireworks were ending. A large, disorderly crowd became aggressive, he said.

Local police needed backup from several other police agencies. In all, 60 officers were called in to shut down the carnival. It took more than an hour to restore order.

Maj. Van Gilder said those arrested included five or six juveniles and several young adults. One suspect attacked a police dog.

CHERRY HILL
Break-in suspect found eating ice cream

A burglary suspect was caught sitting behind a convenience-store counter eating ice cream.

Cynthia Donovan, 47, was arrested last week at the High's convenience store in Cherry Hill.

Cecil County sheriff's deputies responding to an early morning store alarm said they found Miss Donovan sitting behind the cashier's counter eating an ice cream cone.

LONG GREEN
Victim identified in reservoir drowning

Police yesterday identified the teenager who drowned in Loch Raven Reservoir on Sunday afternoon as Keith Cannon of Edgewood. They said the 17-year-old and a female companion had waded out to an island from a sandy clearing known as the Pines, using a rocky ledge underneath the water.

They were wading back to shore along a different route when the ledge disappeared, and Keith slipped under the water. Swimming is prohibited in all three reservoirs in the county.

DISTRICT

Petitions circulating for slots initiative

A group hoping to open a slot-machine gambling casino in Southeast has begun a petition campaign in hopes of putting an initiative on the November ballot.

The group, financed by U.S. Virgin Islands-based entrepreneur Shawn Scott, is enlisting out-of-town canvassers stationed at grocery stores and Metro stops. They earn $2 for each valid signature they get.

Organizers hope to put up to 3,500 slot machines near Martin Luther King Jr. Avenue and Good Hope Road Southeast and eventually similar sites throughout the city.

Mayor Anthony A. Williams and community activists are opposed to the plan. Opponents are paying close attention to the effort because of widespread election-law violations that occurred during a similar push two years ago.

"We're aware of what happened last time," said Jeffrey D. Robinson, an attorney for slots promoters. "We're confident that this will be done right."

To put their initiative on the ballot, supporters must collect the signatures of at least 5 percent of the city's registered voters. They must include at least 5 percent of the registered voters in at least five of the eight wards.

A D.C. resident must be close enough to the potential sites to vote within a half-mile radius of the gambling area.
Hall Declaration Ex. B
MEMORANDUM

TO: ALL RESIDENTS OF 2012, 2014 and 2016 BALTIMORE ROAD

FROM: HORNING BROTHERS CORPORATION

DATE: JULY 6, 2006

SUBJECT: APARTMENT UPDATE

Please note that the City of Rockville has advised us that you may re-enter and re-occupy your apartment homes. However per the notice sent by the City of Rockville on July 3, 2006 they strongly advise against this. If you decide to re-occupy your apartment home you are doing so at your own risk.

The electrical contractor has advised us that the electricity may be restored by Monday, July 10, 2006 if there are no further complication.

Should you need additional housing assistance please feel free to contact:

Rockville Community Services – 240-314-8303
Red Cross – 202-437-6269

We regret this unfortunate event and we are taking necessary steps to get it resolved as quickly as possible.

We would also like to take this opportunity to strongly urge everyone to get renters insurance to cover any personal loss in the future.
Hall Declaration Ex. C
MEMORANDUM

TO: ALL RESIDENTS OF THE FOREST APARTMENTS
FROM: HORNING BROTHERS CORPORATION
DATE: JULY 10, 2006
SUBJECT: APARTMENT UPDATE

Please be advised that due to additional work that needs to be completed the electrical situation will probably take a little longer than expected to be resolved.

If you would like updated information please call Focus Communications, the properties answering service, at 301-421-1111. We will be updating the answering service daily regarding the progress of this situation.

Due to this electrical situation the Rental Office will be open sporadically. Please place your rental payments in the drop slot in the event the office is not open. Late fees for the month of July will be waived.

We apologize for any inconvenience this situation has caused but we are working diligently to get it resolved as quickly as possible.
Hall Declaration Ex. D
Hall Declaration Ex. E
To Whom It May Concern:

Victoria Hall  (Patient) was seen in this facility on 7/13/06.

Patient will be unable to attend school/work until 7/15/06.

[ ] Patient is free from contagious disease and may return to school/work on ____________.

[ ] Patient should be excused from the following until 7/15/06 as she has:

Cervix sinus infection

Physician Signature: [Signature]

Print Physician Name: L. Zahir
Hall Declaration Ex. F
Please be advised that I saw Mrs. Hall in our clinic. She is being treated for sinusitis, earache, and bronchitis. I instructed her to rest at home tomorrow, Monday, 7/17/06.

Thank you.

(Signature)

To ensure brand name dispensing, prescriber must handwrite "BRAND MEDICALLY NECESSARY" on the prescription.