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Attorney for: Plaintiffs

**UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al,	:	
	:	
	:	
Plaintiffs,	:	<i>Assigned to Honorable Eduardo C. Robreno</i>
	:	
vs.	:	
	:	Case No.: 09-cv-01898-ECR
	:	
	:	
ORLY TAITZ, et al,	:	
	:	
Defendants.	:	

AFFIDAVIT OF MATTHEW N. HARRIS

I, Matthew N. Harris am over the age of eighteen (18) and not a party to the within action. I have personal knowledge of the facts herein and if called to do so, I could and would competently testify under oath.

I declare as follows:

1. I am a college student and a radio host with Blog Talk Radio. I am very familiar with the issues pertaining to Ed Hale, his wife Caren Hale and their businesses, in particular Plains Radio Network, Inc. and their slander/libel they have done and continue doing about Evelyn Adams (Momma E). I am also familiar and received a copy of Dossier #6, which was created and sent to me by Orly Taitz.

2. On October 13, 2008, I listened to the Plains Radio Show and heard Ed Hale say that he was going to call Evelyn Adams aka MommaE a name that Caren Hale, his wife, was going to cuss him for and then said that MommaE would climb in the bed with anybody that would give her a buck.

3. On October 20, 2008, I listened to the Plains Radio show hosted by Ed and Caren Hale. During this particular radio show, Mr. Hale, on air, was calling Evelyn Adams "Momma Obama". In addition, Ed Hale made the following nasty statements:

"There is another person out there that is probably the sorriest, low life bitch that I have ever had the unpleasure of knowing and that is Momma E. She is the worst pathetic person that ever walked on 2 feet."

4. Mr. Hale continued this radio show claiming he had filed suit against "Momma E" for trashing him. Mr. Hale continued stating *"I am going to trash you up one side and down the other"* referring to Momma E. Mr. Hale continued on his rampage with a warning to Momma E and *"cohorts"* that they have the intelligence of a Moron or less; that he was tired of it he was taking her butt to Court going to take every damn dime that she *"got"*, that he warned her and warned her but she kept making trouble, claim she kept trashing her, and that he was *"going after it now lady"*. Mr. Hale called Evelyn Adams (Momma E) an idiot, the most stupid ignorant person that ever walked on two feet.

5. Mr. Hale continued his comments on air about Evelyn Adams (Momma E) stating *"She's a 70 year old woman that doesn't know how to do anything except gossip like all old women, don't even talk to me about her intelligence, she's the Ass of the airways"*. *"She is full of bull and I am taking her butt down in Court. She got several hundreds of thousands of dollars from a Workman's Comp in Caolifronai and then moved back here to hide from California"*. Mr. Hale continued accusing Evelyn Adams (Momma E) of other things and

stated “*Momma has hers coming*”. Mr. Hale then making statements he claims Evelyn Adams (Momma E) made, stating “*I spent my life in California and that she sued and got the money and laughs about it*”.

6. Mr. Hale then told his listeners that Evelyn Adams (Momma E) is a fraud and was telling his listeners to call in to Momma E’s radio show and tell her that she is a lying “hussy”. Mr. Hale told his listeners to dial *67 to block their numbers when they call her.

7. Mr. Hale continued his outrageous lies and slander of Evelyn Adams (Momma E) stating “*If Momma E mentions me on the show it will cost her more money because the lawsuit I filed on her*”. Mr. Hale continued stating Momma E would be served in three days in Wynnewood, Oklahoma and she will have to prove all these things about him. Mr. Hale stated the only reason Evelyn Adams (Momma E) had a show was to trash him and that she is “*undoubtedly the stupidest ignorant-ness woman that ever walked and she is now to be referred too as Momma Obama*”. Mr. Hale continued stating “*I am warning you damn you Momma E, if you say one word bad about me you will wish the hell you hadn’t that she has trashed me for months*”.

8. Caren Hale then interjected stating “*Momma E has been trashing Ed for a long time*”, knowing the information to be untrue. Mr. Hale then jumped back in stating “*I am gonna see that Phil Berg loses his licenses that he is in the tank with Momma E and Phil Berg caused all the trouble and I am gonna get his license because he is a lying SOB (son of a bitch) because he got the Kenyan Birth Certificate and I can prove it. Phil Berg is the one of the lowest life sons of bitches I have ever met*”.

9. I have never heard Evelyn Adams (Momma E) trash Mr. Hale or anyone else and I listen to her radio shows daily.

10. On April 17, 2009, I received the attached e-mail from Orly Taitz, at her email address of dr_taitz@yahoo.com in my personal e-mail.

11. As you can see below, Ms. Taitz's email with her Dossier #6 attached was sent out in a mass e-mailing of a 100 people in each email. Ms. Taitz's email is titled "*More explosive information dossier #6*" See the email header below:

"Date: Fri, 17 Apr 2009 09:10:41 -0700
From: dr_taitz@yahoo.com
Subject: More explosive information dossier #6

To: amccarthy@nationalreview.com; amy.chozick@wsj.com; ken@jhelp.com; backon@vms.huji.ac.il; shellijbaker@aol.com; johnbatchelorshow@gmail.com; mbelcher72@yahoo.com; beesba@aol.com; talkradio@live.com; tammyblog@yahoo.com; heytammybruce@yahoo.com; sean@wcbm.com; charenmail@cox.net; pchesler@phyllis-chesler.com; chuck.todd@nbcuni.com; info@hillaryclinton.com; clothhead@sfchronicle.com; nocompromisewhenyoueright@gmail.com; evil@evilconservativeonline.com; john@gopsenators.com; jrlc@optonline.net; jric@optonline.net; jric@earthlink.net; acoulter@worldnetdaily.com; carol@harrismedia.com; darlagdawald@yahoo.com; dickmorris@dickmorris.com; jdooley@honoluluadvertiser.com; drudge@drudgereport.com; editor@americanthinker.com; editor@haaretz.co.il; elouis@nydailynews.com; gdescobar@aim.com; alisia.essig@mail.house.gov; eugenerobinson@washpost.com; eva@dennisprager.com; jfarah@wnd.com; joel.fishman@gmail.com; david.freddoso@gmail.com; dfrum@aei.org; mhgintn@comcast.net; kyeoj@mchsi.com; GaynorMike@aol.com; patrickgibsonmail@gmail.com; glenn.simpson@wsj.com; jonahnro@aol.com; agrobman@nj.rr.com; Patrick_Guinn@coburn.senate.gov; mh1690@hotmail.com; barhfarms@gmail.com; author@victorhanson.com; khassett@aei.org; hemingway@nationalreview.com; hhewitt@hughhewitt.com; Brannon@worldviewweekend.com; churt@nypost.com; ymibrahim@gmail.com; info@ap.org; editor@israelinsider.com; Gregg.Jackson@gmail.com; jhood@johnlocke.org; jhorowitz@observer.com; jim.manzi.nro@gmail.com; producer@infowars.com; bryant.jordan@military-inc.com; roger@aim.org; kevin@davnet.org; kincaid@comcast.net; jawaraking@yahoo.com; jklinghoff@aol.com; ck@charleskrauthammer.com; msk@cis.org; lkudlow@kudlow.com; comments.kurtz@nationalreview.com; devvyk@earthlink.net; stevenlaib@sbcglobal.net; MLANGBERT@NYC.RR.COM; larry.king.live@cnn.com; letters@cctimes.com; letters@macleans.ca; letters@msnbc.com; letters@nationalreview.com; letters@ocregister.com; letters@sun-sentinel.com; letters@washpost.com; marklevin.show@citcomm.com; ylevin@eppc.org;

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klopez@nationalreview.com; cmahtesian@politico.com; malzbergtalk@gmail.com;
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12. In Ms. Taitz’s email was attached “Dossier #6”, which was information about Lisa Liberi and that she had an extensive criminal history. In reading this Dossier #6, I noticed that all of the personal information was xxx'd out, except for a Birth Date and one full Social Security Number, which I later found out was Phil Berg's Assistant Lisa Liberi's information. At the top of the Dossier #6 you can see who all Orly Taitz sent it to including 26,000 U.S. and International News Organizations.

13. There are also e-mails in this document from Neil Sankey at the Sankey Firm, that shows he was involved in the production of this Dossier #6 by Orly Taitz.

14. I was shocked to receive something like this from an Attorney and wondered why Dr. Taitz would do something like this. This document contained personal information of Lisa Liberi, Mr. Berg’s Paralegal, which is not public information and identity theft in our country is exorbitant.

I declare under the penalty of Perjury of the laws of the United States that the foregoing is true and correct. Executed this 20 day of July, 2009.

Matthew Harris
MATTHEW N. HARRIS, Declarant
406 Calgary Glen
Austell, GA 30168

State of Georgia)
County of Fulton §

On this 20th day of July, in the year 2009, before me Yvonne Ellis
Notary Public Name
a notary public, personally appeared Mathew N. Harris, and proved on the basis of satisfactory evidence to be the person whose name is subscribed to this instrument, and acknowledged he executed the same. Witness my hand and official seal.

Yvonne Ellis
NOTARY PUBLIC

My commission expires: 3/7/11

