## **EXHIBIT "15"**

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

## CASE NO.: 13-20610-CIV-ALTONAGA/Simonton

LARRY E. KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH, INC., et al.,

Defendants.

## **DECLARATION UNDER PENALTY OF PERJURY OF PAUL J. ORFANEDES**

CITY OF WASHINGTON

DISTRICT OF COLUMBIA )

PAUL J. ORFANEDES, pursuant to 28 U.S.C. §1746, makes the following declaration under the penalty of perjury:

1. I am over the age of eighteen (18) and I am capable of making this affidavit.

2. I have personal knowledge of the following facts and, if called upon as a witness, could testify competently thereto.

3. I am a resident of the Commonwealth of Virginia.

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4. It is my understanding that Larry Klayman has sued me, Judicial Watch, Inc., and other Judicial Watch, Inc. employees alleging that we, on or about February 22, 2012, "negligently, maliciously and/or willfully published and furthered the publication of a false statement that Plaintiff Klayman had been 'convicted' of a crime for not paying a large amount of child support with regard

to his children, on the internet and elsewhere within this judicial district, Florida, and elsewhere throughout the United States and the world."

5. I deny Klayman's claims and I deny that I am liable on Klayman's claims for defamation, defamation by implication, tortious interference with a contract, and intentional infliction of emotional distress.

6. Klayman attempted to achieve service of process on me on June 19, 2013 by serving the Summons and Amended Complaint on Susan Prytherch at 425 Third Street, SW, Suite 800, Washington, DC 20024. This is the address of Judicial Watch, Inc., my employer, and this is not my residence address. Susan Prytherch is a co-worker and she is not an agent authorized by appointment or by law to accept or receive service of process for me.

FURTHER DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2013 in Washington, D.C.

Paul G. Oft

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