

EXHIBIT “15”

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 J. ORFANEDIS