

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GAMES WORKSHOP LIMITED,)	
)	
Plaintiff,)	
)	Case No. 1:10-cv-08103
v.)	
)	
CHAPTERHOUSE STUDIOS LLC and)	
JON PAULSON d/b/a PAULSON GAMES,)	Judge Matthew F. Kennelly
)	
Defendants.)	

**DECLARATION OF NICHOLAS VILLACCI IN SUPPORT OF
DEFENDANT CHAPTERHOUSE STUDIOS LLC’S
OPPOSITION AND CROSS MOTION TO COMPEL**

I, Nicholas Villacci, declare as follows:

1. I am the founder of Chapterhouse Studios LLC (“Chapterhouse”), a Texas Limited Liability Corporation, and in charge of all of its operations.
2. Chapterhouse has no employees. Instead, Chapterhouse uses independent artists, designers, and sculptors to whom it can turn when it wishes to execute a specific project.
3. Michael Lawler has occasionally worked as a concept artist for Chapterhouse. None of Chapterhouse’s products at issue in this action are derived from Mr. Lawler’s concept art.
4. Mr. Lawler is not an employee or member of Chapterhouse.
5. Tomas Fiertek is a sculptor who frequently does work for Chapterhouse. Mr. Fiertek has designed and sculpted a number of Chapterhouse’s miniature products and accessories.
6. Tomas Fiertek is not an employee or member of Chapterhouse.

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

Dated: February 13, 2012

By: 
NICHOLAS VILLACCI