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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PENGUIN GROUP (USA) INC.,

Plaintiff,

Case No. 09 CIV 00528 JGK

-against-

AMERICAN BUDDHA,

Defendant.

DECLARATION OF TARA LYN CARREON
IN SUPPORT OF AMERICAN BUDDHA'S APPLICATION FOR LEAVE
TO ATTEND PRETRIAL CONFERENCE TELEPHONICALLY

In support of Defendant American Buddha's application for leave to attend the pretrial conference set for Monday, August 1, 2011 at 4:30 p.m. in front of the Hon. John G. Koeltl via telephone, American Buddha submits the attached Declaration of Tara Lyn Carreon.

Dated: July 25, 2011
Respectfully submitted:

Charles Carreon (California Bar # 127139)
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DECLARATION OF TARA LYN CARREON

Tara Lynn Carreon states and declares:

1. I am the sole director and President of American Buddha, and make the following statements of personal knowledge, and if called as a witness could and would so competently testify.
2. American Buddha has no sources of revenue whatsoever. I provide all of the labor that is reflected in the operation of the neederlibrary.com web site that gave rise to the herein litigation, and perform that work in my function as the librarian for the American Buddha Online Library, a charitable project of American Buddha, an Oregon nonprofit corporation.
3. At no time has American Buddha contributed any funds to the defense of the litigation initiated by Penguin against American Buddha.
4. American Buddha has no funds whatsoever to pay for travel, lodging, board and other transportation expenses of American Buddha's advocate.

I declare and affirm pursuant to 28 U.S.C. § 1746(2) that the foregoing is true and correct under the laws of the United States of America, and that this declaration was executed at Tucson, Arizona on this 22nd day of July, 2011.


Tara Lyn Carreon