## EXHIBIT B

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CRAIG LENELL, THOMAS URBANEK,

JARED PELA, TIMOTHY CHRISTIAN, JOHN

LEWIS, CARLOS PEREZ, and PHILLIP WILTSHIRE on behalf of themselves and all

others similarly situated,

No. 2:14-cv-01924-LDD

**CLASS ACTION** 

Plaintiffs,

:

VS.

ADVANCED MINING TECHNOLOGY, INC. (a/k/a ADVANCED MINING TECHNOLOGIES,

INC.); JOSHUA ZIPKIN; and JIM BROWN,

JURY TRIAL DEMANDED

Defendants.

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## DECLARATION OF BENJAMIN F. JOHNS PURSUANT TO CALIFORNIA CIVIL CODE SECTION § 1780(d)

- I, Benjamin F. Johns, declare as follows:
- 1. I am a partner at Chimicles & Tikellis LLP, and counsel for Plaintiffs in this action. I make this declaration based upon my personal knowledge and could and would testify thereto if called as a witness.
- 2. I submit this affidavit in support of the Amended Class Action Complaint, which is based in part on violations of the California Consumer Legal Remedies Act, California Civil Code § 1750 *et seq*.
- 3. Pursuant to CAL. CIV. CODE 1780(d), Plaintiffs state that they filed the lawsuit in this Court because it encompasses the county in which one or more Defendants reside, is where

AMT has its principal place of business, and is where a substantial portion of the relevant transactions occurred.

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

Executed on June 30, 2014, in Haverford, Pennsylvania.

Dated: June 30, 2014 Respectfully submitted,

By:

Kimberly Donaldson Smith Benjamin F. Johns CHIMICLES & TIKELLIS LLP One Haverford Centre 361 West Lancaster Avenue Haverford, PA 19041

Telephone: (610) 642-8500 Facsimile: (610) 649-3633 E-mail: KMD@chimicles.com

BFJ@chimicles.com

Proposed Lead Attorneys for Plaintiffs and the Class