

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA – CIVIL DIVISION**

Imagos Films, LLC	§	
d/b/a Imagos Softworks,	§	
and Don Thacker, individually	§	
Plaintiffs,	§	No.: 2:17-cv-02964-BMS
	§	
v.	§	
	§	
Alex Thomas Mauer,	§	CIVIL ACTION
Defendant.	§	COMPLAINT FOR PROPERTY
	§	RIGHTS INFRINGEMENT
	§	
	§	

DECLARATION OF LEONARD FRENCH

I, Leonard J. French, Esq., declare as follows:

1. I am Plaintiffs’ Counsel in the present case.
2. I contacted Defendant on July 11, 2017, and informed her of the July 13, 11 AM hearing on our Temporary Restraining Order Application.
3. I received confirmation within the hour that Defendant had received my message.
4. Since June 26, 2017, I have received threats of serious bodily injury and death from Defendant. These threats are attached as Exhibit B.
5. The messages in Exhibit B were received directly by me to my email address, have been solely in my possession and control, and have not been altered in any way by me or by anyone to my knowledge.
6. Defendant’s threats have caused me to increase security at my significant expense.
7. Defendant’s threats have caused me anxiety and sleeplessness.
8. I believe defendants threats are in attempt to coerce myself and Plaintiffs to drop or otherwise not pursue this litigation, or to protract and increase the costs of this litigation.

9. Defendant has informed me that she believes she is judgment proof. This message is attached as Exhibit C.
10. The message in Exhibit C was received directly by me to my email address, has been solely in my possession and control, and has not been altered in any way by me or by anyone to my knowledge.
11. I have personal knowledge of myself, my activities, and my intentions, in the foregoing matter, and, if called to testify, I would competently testify as to the matters stated herein.
12. I verify, under penalty of perjury, that the foregoing is true and correct, under 28 U.S. Code § 1746.

Executed on:

7/11/2017

Leonard French:

/s/leonardjrench