

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

PARKS, MILLICAN & MANN, LLC

Plaintiff,

vs.

FIGURES TOY COMPANY,
and

RING OF HONOR WRESTLING
ENTERTAINMENT, LLC,

Defendants.

CASE NO. 2:16 – cv – 522

AFFIDAVIT OF RICHARD P. MANN

COMMONWEALTH OF VIRGINIA
CITY OF VIRGINIA BEACH, to-wit:

I, Richard P. Mann, declare as follows:

1. I am the same person known and referred to as “Rico Mann” in Parks, Millican & Mann’s Complaint, First Amended Complaint, Second Amended Complaint, and any and all pleadings in the above-captioned matter.
2. At all times relevant to the above-captioned proceedings, I was a principal and/or managing member of Parks, Millican & Mann, LLC.
3. On or about February 6, 2017, I received the letter and reinstatement package dated January 19, 2017, for Parks, Millican & Mann, LLC from the Virginia State Corporation Commission, a copy of which is attached hereto as **Declaration Exhibit A**.
4. On the same day that I received the reinstatement package, I completed and returned the same to the Virginia State Corporation Commission as directed, along with the correct payment.

5. On or about May 17, 2017, I became aware that the Virginia State Corporation Commission was still showing Parks, Millican & Mann, LLC as “canceled” on the State Corporation Commission’s website.

6. Therefore, on May 30, 2017, I personally prepared and hand-delivered a duplicate Application for Reinstatement of a Virginia Limited Liability Company to the Virginia State Corporation Commission and paid in-person the applicable fee for reinstatement. See **Declaration Exhibit B**.

7. By agreement and through my position as Managing Member of Parks, Millican & Mann, LLC, I have transferred my rights with respect to my copyrighted and copyrightable work for Ring of Honor Wrestling Championship Belts to Parks, Millican & Mann, LLC for registration and enforcement of any and all rights and protections with respect to these designs.

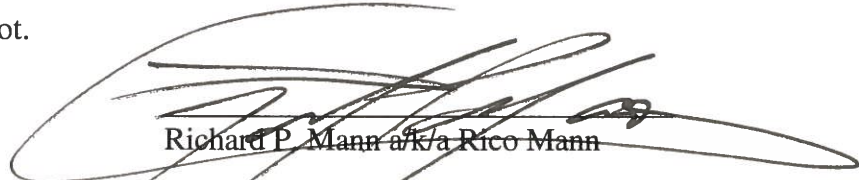
8. I, personally, communicated directly with Steve Sandberg (“Sandberg”) of Figures Toy Company (“Figures”) with regard to contract negotiations for the production of replica Ring of Honor Wrestling Championship belts.

9. Figures, through Sandberg, and during active negotiations with respect to the contract for production of the replica championship belts, confirmed with me that we had a gentleman’s agreement for the production of the replica belts and I provided the designs in reliance upon this agreement. These negotiations expressly involved expectation of payment from Figures for the production of replica items using Parks, Millican & Mann, LLC designs.

10. The email dated April 22, 2014 from myself to Sandberg, which is attached as Exhibit 4 to the Second Amended Complaint, is a true and accurate copy of one of multiple emails between myself and Sandberg with respect to contract negotiations and confirms facts upon which I relied in sending the belt designs to Figures.

AFFIDAVIT OF RICHARD P. MANN A/K/A "RICO MANN"

Further affiant sayeth not.


Richard P. Mann a/k/a Rico Mann

This day personally appeared before me, the undersigned Notary Public in and for the county/city and state aforesaid, Richard P. Mann a/k/a Rico Mann, to me known to be the person named herein, who after being duly sworn, deposed and said that the facts contained in the foregoing instrument are true and correct.

Sworn and subscribed to before me this 30 day of May, 2017.



Notary Public

My Commission Expires: 7/31/2019
My Registration No. 7654317

