

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Jerry L. Moore,

Civil No. 27-CV-09-17778

Plaintiff,

v.

**AFFIDAVIT OF JERRY MOORE RE
NOTICE OF MOTION & MOTION
TO DISQUALIFY COUNSEL**

Donald W.R. Allen, individual and as
Principal of V-Media Development
Corporation, Inc. a Minnesota Non-
Profit corporation, John Hoff a/k/a
Johnny Northside, and John Does
1-5,

Defendants.

I, Jerry Moore, being first duly sworn depose and state:

1. I am the plaintiff in this case.
2. I have had a number of communications from Don Allen, who is a defendant in this case (his business is also a defendant). I have not solicited the information, but Mr. Allen has approached me.
3. Based on all that I know, it is clear to me that Don Allen wants to testify against Johnny Northside, and to explore being released by me (plaintiff) from this lawsuit, in exchange for providing that information. It is my belief that Mr. Allen also has information about the identities of the John Doe's. This information is important to my lawsuit. I understand that Attorney Goins has represented that the defendants don't have much money to settle this case. But the John Doe's may well have resources to adequately settle it. Further, I have been told, repeatedly, by Don Allen, that Albert Goins does not represent him. This is a summary, but the details are below.
4. On or about November 11, 2009, Mr. Allen told me that Attorney Goins does not represent him.

5. On October 22, 2009, I ran into Mr. Allen. He told me that he will be out of town but that he would like to "bury Johnny Northside...."

6. On October 11 or 12, 2009, I received word through a community member that Don Allen wanted to testify against Johnny Northside in this case.

7. On September 13 or 14, 2009, Don Allen told me that he was not represented by Attorney Goins.

8. On August 20, 2009, I stopped in at a restaurant and Don Allen happened to be there. He told me that Attorney Goins does not represent him in this lawsuit.

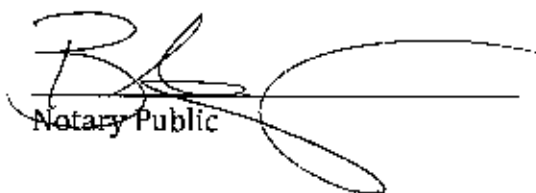
9. Of course, I am also aware of the email that Don Allen sent to my attorney on Sunday, November, 2009.

10. Also, I am hearing very similar things from members of the community, that Don Allen is approaching them, stating that he wants to settle with me, resolve our issues in exchange for providing information against his co-defendant Johnny Northside.

11. I am very concerned that Attorney Goins is preventing this from happening. I want to identify the John Doe defendants, and I believe that some of them are associated with Attorney Goins. I am concerned that perhaps Attorneys Goins is protecting the John Does, which seems yet another conflict of interest.

This concludes my affidavit of 2 pages.

Signed and sworn before me this
17th day of November, 2009.


Notary Public


Jerry M. Moore

