

## **EXHIBIT B**

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO  
CIVIL DIVISION

ELLORA'S CAVE PUBLISHING, INC.  
and  
JASMINE-JADE ENTERPRISES, LLC

Case No: CV-2014-09-4421

Plaintiffs,

v.

DEAR AUTHOR MEDIA NETWORK, LLC  
and  
JENNIFER GERRISH-LAMPE

Defendants.

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**DECLARATION OF BRIANA LAMBERT IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS' MOTION FOR ENTRY OF A  
TEMPORARY INJUNCTION**

I, Briana Lambert, having personal knowledge of the matters set forth herein and being competent to testify about them if called to do so at trial, state as follows:

1. I began working with Ellora's Cave in August 2002 as a volunteer proofreader. Beginning February 2003, I became a paid contract employee. In 2007, I became an author with Ellora's Cave as well.
2. As an editor, I was typically paid for my work every two weeks.
3. However, beginning in August 2014, I began experiencing problems with receiving timely payment from Ellora's Cave.
4. I was not paid for the projects I completed between August 23, 2014 and September 1, 2014, and was owed \$7,346.28.
5. On September 28, 2014, I received an envelope in the mail that contained no postmark, with a check dated August 8, 2014, for \$1,838.05.
6. On October 4, 2014, I received a check in the mail, which was dated August 22, 2014, for \$3,426.67.
7. At the time of this writing, I remain unpaid for project submitted between August 14, 2014 and September 1, 2014 for \$2,081.56.
8. Over the past few months, payment has been significantly delayed, with no communicated expectation of a realistic payment timeline. Many emails were sent to

management, including a number of emails to Courtney Thomas, CFO of Ellora's Cave.

9. I received one delayed email in response from the CFO that promised that payment would happen, but never established a timeline and never stated that the checks would be in the mail. I was simply told to be patient.
10. On August 18, 2014, I received an email along with the fourteen other freelancers, informing us that we were all being laid off. We were told that to receive payment for the projects we were already working on, we would have to have it turned in by September 12, 2014, or our payment for these projects would be docked and delayed.
11. In my 12 years with Ellora's Cave, I have never seen layoffs before. Over time, some editors would come and some would go, and sometimes, small groups of two or three would leave together to form their own publishing company. But I have never seen 15 editors terminated at the same time.
12. I have still not been paid for work I completed, in the timely fashion imposed in our layoff notice.
13. The writing is on the wall that the company is simply not in a good financial position and may not last much longer.
14. At this point, I am ashamed to have been associated with Ellora's Cave, having witnessed the financial decline and the terrible treatment of authors, freelancers, and staff.
15. I was frustrated and shocked that a company that seemed to have it all had fallen apart so quickly.
16. I cannot say the *Dear Author* article changed my opinion, as my opinion was already rather poor, well before the article came out.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed this 10/13/2014.

DocuSigned by:

Briana Lambert

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Briana Lambert