

EXHIBIT F

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.

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

I, Mary Harris, 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 for Ellora's Cave February 24, 2014.
2. I applied for and was accepted as a development/content editor, beginning as a junior and later promoted to senior.
3. In the past, I was typically paid within 2 weeks of the end of the pay period.
4. I began experiencing payment problems with Ellora's Cave with the submission of my July 24, 2014 invoice.
5. I have not been paid in full for the invoice I submitted on September 15, 2014. I am still owed \$4541.59

6. The way I have been paid since July, 2014 is different than how I was paid in the past in terms of lateness. I received my first check in a timely manner. My second July 24, 2014 invoice was not paid until September 22, 2014.
7. I am not an author with Ellora's Cave, nor do I or have I worked in any capacity other than junior and senior development/content editor with Ellora's Cave.
8. I am still owed \$4541.59.
9. I received several communications from persons at Ellora's Cave regarding late payments due to: "a delay, but checks went out late last week"; "the checks went out last Thursday, however, after looking at the payroll, you didn't report anything that pay period"; declining sales due to Amazon; "payment for editing these books might be delayed,"; several emails requesting me to also notify others at Ellora's Cave about my lack of payment; and a final note that "to be frank, these emails from you are just being deleted unread. ... things not yet paid are NOT put on the next payment – that would cause duplicate account. ... So Accounting will pay when they can, by the two-week period. The emails from you would just confuse the issue and delay payment..." (this last in reference to my updated invoice reflecting payment on 9/22/14 and the balance due of \$4541.59).
10. My belief in the validity of those explanations for late payment is that most were a lie in order to defer actual payments, and the last was an attempt to blame me for causing any confusion which would result in delayed payments.
11. My opinion of Ellora's Cave is that it was a viable company at one point. But, my observation is that the money which was coming in was not used to pay editors. I decline to speculate on whether freelance cover artists or authors were paid in a

timely and fully sufficient manner. I look rather to how I have been paid – I have not been paid in a timely and fully sufficient manner.

12. My opinion of Ellora’s Cave between end of July, 2014 and the publication of the Dear Jane article is the same as it is now. The article did not change my perception. I knew that Ellora’s Cave was not meeting its financial obligations, and most people who did business with Ellora’s Cave knew the same thing.

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

Executed 10/13/2014, in Chicago, Illinois.

DocuSigned by:
Mary Harris

Mary Harris 99BDD8EF04C941C...