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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Three Angels Broadcasting Network, Inc.,  
an Illinois non-profit corporation, and  
Danny Lee Shelton, individually,

Case No. 08-MC-7 (RHK/AJB)

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

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**AFFIDAVIT OF M. GREGORY SIMPSON**

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STATE OF MINNESOTA    )  
  )  
COUNTY OF HENNEPIN    )       ss.

M. Gregory Simpson, being first duly sworn upon oath, deposes and states as follows:

1. I am an attorney licensed in the State of Minnesota and am one of the attorneys representing Plaintiff Danny Shelton in an action in the Federal District Court of the District of Massachusetts captioned *Three Angels Broadcasting Network, Inc. and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle* (No. 07-40098-FDS (D. Mass.)). I make this affidavit based upon my knowledge and information. I recently substituted for Jerrie M. Hayes as counsel of record in this matter.

2. Attached hereto as Exhibit A is a true and correct copy of the Affidavit of Jerrie M. Hayes, filed and served in the above-referenced lawsuit in Massachusetts. The

Hayes Affidavit was filed in connection with a pending motion to compel production of documents brought by Defendant Pickle in that Court. It is submitted herewith to partially explain events that have occurred since this matter was argued before Judge Boylan on March 4, 2008.

3. A motion to limit the scope of discovery is being prepared under my supervision for filing in the Massachusetts court where the underlying case is venued. The motion will address, among other things, the relevancy and scope objections that Plaintiffs have regarding the MidCountry Bank records that were the subject of this Court's Order dated March 28, 2008. Barring unforeseen events, the motion will be on file within one week of this affidavit.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: June 18, 2008

s/M. Gregory Simpson

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M. Gregory Simpson

Subscribed and sworn to me  
this 18th day of June, 2008.

s/Amy Ditty

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Notary Public

My Commission Expires Jan 31, 2010