

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATTHEW CHRISTIANSEN,

Plaintiff,

-against-

OMNICOM GROUP, INC., DDB WORLDWIDE
COMMUNICATIONS GROUP, INC., JOE
CIANCIOTTO, PETER HEMPEL and CHRIS
BROWN,

Defendants.

15 Civ. 3440 (KPF)

**DECLARATION OF
DANIEL A. FEINSTEIN**

DANIEL A. FEINSTEIN, hereby declares under penalty of perjury:

1. I am a member of the law firm of Davis & Gilbert LLP, attorneys for defendants Omnicom Group Inc., DDB Worldwide Communications Group Inc. ("DDB"), Peter Hempel and Chris Brown (collectively, "Defendants"). I submit this Declaration in further support of Defendants' Motion to Dismiss Plaintiff's First Amended Complaint.
2. In my Declaration dated July 31, 2015 and submitted in support of Defendants' Motion to Dismiss, I attached as Exhibit G a true and accurate copy of an Annulment Determination dated July 21, 2015, by which the NYSDHR dismissed Plaintiff's NYSDHR Complaint and annulled his election of remedies ("Annulment Determination").
3. The Annulment Determination was received by Davis & Gilbert LLP by regular mail after July 21, 2015.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 8, 2015
New York, New York



DANIEL A. FEINSTEIN