Michael P. Laffey, Esq. NJ Bar No. 026761986 Messina Law Firm, P.C. 961 Holmdel Road Holmdel, NJ 07733-2103 Tel: (732) 332-9300; Fax: (732) 332-9301

Attorneys for Defendants

Michael Ferguson, Benjamin Unger, Sheldon Bruck, Chaim Levin, Jo Bruck, Bella Levin,

Plaintiffs,

V.

JONAH (Jews Offering New Alternatives for Healing f/k/a Jews Offering New Alternatives to Homosexuality), Arthur Goldberg, Alan Downing, Alan Downing Life Coaching, LLC,

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - HUDSON COUNTY DOCKET NO. L-5473-12

Civil Action

CERTIFICATION OF ANTHONY TAWADROUS IN OPPOSITION TO THE PLAINTIFFS MOTION TO ENFORCE PERMENANT INJUNCTION AND DEFAULT JUDGMENT

I Anthony Tawadrous certify as follows.

- 1. I am an employee Maximize Studio and as such I am fully familiar with the facts set forth herein.
- 2. Maximize Studio is the company that created and hosted the JONAH website.
- 3. At the request of Arthur Goldberg the website was shut down on May 1, 2016.
- 4. Maximize Studio removed all data from the website and archived it.
- 5. While the domain name still existed anyone attempting to use the link for the domain after the above date would not be taken a website.

- 6. At one point administrative access to the domain name could be obtained by entering the administrator's user name and password but there would no longer be any pages or data for even the administrator to access other than the domain name itself.
- 7. I certify that the within statements are true I know that if any of the within statements are willfully false I am subject to punishment.

Date

Anthony Tawadrous