

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

**DECLARATION OF
JHON SANCHEZ**

DONALD ZARDA,

Plaintiff,

01 Civ 4334 (JFB)

**ALTITUDE EXPRESS, INC.,
dba Skydive Long Island, and RAY MAYNARD,**

Defendants.

-----X

JHON SANCHEZ, an attorney admitted to the courts in this state and judicial district, does hereby declare under penalty of perjury as follows:

1. Attached as Exhibit AA are photographs produced by subpoena from David Kengle after Kengle's and Orellana's depositions. The first two have had shadows removed because they were produced darkened. Otherwise all others are untouched. Photograph 1 shows plaintiff with Orellana sitting on him; his hands do not appear to be resting on her hips. Photograph 30 is the clearest picture of Kengle.
2. Attached as Exhibit BB is the amended complaint.
3. Attached as Exhibit CC answer to the amended complaint.
4. Attached as Exhibit DD is David Kengle's Affidavit in which he changed his testimony after he signed his deposition with no changes.
5. Attached as Exhibit EE is Rosana Orellana's Affidavit in which she changed his testimony after he signed his deposition with no changes.

6. Attached as Exhibit FF are pictures of plaintiff on the SDLI dropzone Facebook page that were taken while he was working there and still and remain available for the public to see. See <http://tinyurl.com/bn4lxws>.

Dated: New York, New York
April 8, 2013

/s/
JHON SANCHEZ (JS 1850)
Of Counsel to Gregory Antollino
18-20 West 21st Street Suite 802
New York, NY 10010
(212) 334-7397