

FILED

MAY 21 2003

LARRY W. PROPPES, CLERK
COLUMBIA, SC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

LESLIE T. GIBLIN and LES GIBLIN	:	
BOOKS, INC.,	:	
	:	
Plaintiffs,	:	
	:	CIVIL ACTION
Vs.	:	
	:	FILE NO. 0-03-1349-17
DEXTER YAGER, DOYLE YAGER	:	
and INTERNET SERVICES	:	
CORPORATION,	:	
	:	
Defendants.	:	

AFFIDAVIT OF BRIAN ZIMA

COUNTY OF BERGEN

STATE OF NEW JERSEY

Personally appeared before the undersigned officer, Brian Zima, who after being duly sworn, deposed and said:

1. My name is Brian Zima. I am over the age of eighteen and am competent to give the within affidavit, which is based on my personal knowledge.
2. Les Giblin is my grandfather.
3. I created the website www.skillwithpeople.com for my grandfather in 1999 as part of a computer science course while in college at the University of Pennsylvania.

37

4. For the website, I created a page for the listing and sale of my grandfather's books (www.skillwithpeople.com/pages/view_books.html).
5. I obtained the information for this page, including the erroneous information regarding the first publication date for *Skill With People*, from www.amazon.com, which sells my grandfather's books.
6. In creating this page, I did not check any of my grandfather's copyrights to determine the actual first date of publication or registration.
7. I also did not have a copy of any of my grandfather's books when I created the website.
8. I listed *Skill With People* first, because it is his most popular book, and I was then under the belief that it was the first book he wrote.
9. I knew that my grandfather wrote and published his first book in 1956.
10. This is how the date 1956 became attached to *Skill With People* on this website.
11. I do not have and have never seen a version of *Skill With People* that pre-dates the 1968 edition of *Skill With People*.
12. My grandfather's first book was *How To Have Confidence And Power In Dealing With People* and was not *Skill With People*.

13. My grandfather wrote and published *How To Have Confidence And Power In Dealing With People* in 1956.

14. My grandfather did not write or publish *Skill With People* until 1968.

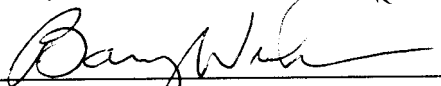
15. I will be changing the website to correct this error.

16. I apologize for any misunderstanding that this may have caused.

FURTHER AFFIANT SAYETH NOT.


BRIAN ZIMA

Sworn to and subscribed before me
this 14th day of May, 2003.


Notary Public

My commission expires: DEC 9, 2006

Notarial Seal
Barry Weidner, Notary Public
Lower Makefield Twp., Bucks County
My Commission Expires Dec. 9, 2006
Member, Pennsylvania Association of Notaries