

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

TAMARA GREEN;
THERESE SERIGNESE; and
LINDA TRAITZ

Plaintiffs,

vs.

WILLIAM H. COSBY, JR.

Defendant.

Civil Action No.:
14-cv-30211 (MGM)

DECLARATION OF FRANCIS D.
DIBBLE, JR., IN SUPPORT OF
WILLIAM H. COSBY JR.'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR LEAVE TO SERVE
SUBPOENA

FRANCIS D. DIBBLE, JR., hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Bulkley, Richardson and Gelinas, LLP, and counsel of record in this matter along with Robert P. LoBue, of Patterson Belknap Webb & Tyler LLP, who is appearing *pro hac vice*, and Jeffrey E. Poindexter, of my law firm. I have read Plaintiffs' Motion for Leave to Serve Subpoena Upon Third Party, Requesting Documents Regarding Plaintiffs, and accompanying Memorandum in Support (the "Motion" and the "Memorandum") in this matter, and I am familiar with the factual allegations made therein. The purpose of this Declaration is to respond to allegations about Plaintiffs' counsel's actions and representations which were contained in the Motion and Memorandum.

2. The Memorandum contains allegations that at some point after March 12, 2015, "defense counsel," see Memorandum, p. 5, was asked to and refused to participate in a conference pursuant to Fed. R. Civ. P. 26(f).

3. I believe that I have participated in all the conversations between Mr. Cosby's counsel of record in this matter and Plaintiffs' counsel.

4. I have no written record of any request for a Fed. R. Civ. P. 26(f) conference, nor do I recall any request for a Fed. R. Civ. P. 26(f) conference. I never refused any such request.

5. I do recall other discussions of issues of discovery in this litigation including discussion of whether defendant would assent to the issuance of the subpoena sought by this Motion. On behalf of Mr. Cosby, we declined to assent to the issuance of the subpoena.

Dated: Springfield, Massachusetts
April 21, 2015

/s/ Francis D. Dibble, Jr.
Francis D. Dibble, Jr.