

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TODD J. HOLLIS,

Plaintiff,

vs.

TASHA C. JOSEPH, individually, and as owner  
and operator of DONTDATEHIMGIRL.COM,  
EMPRESS MOTION PICTURES, doing  
business as THE CAVELLE COMPANY, INC.,  
CAROLYN MERITT LATTIMORE, ALESCIA  
ROSKOV, ANNA DOE, BARBARA DOE,  
CATHERINE DOE, DEBORAH DOE, and  
EMILY DOE,

Defendants.

) CIVIL DIVISION  
)

) No. GD 06-12677  
)

) Code: 008  
)

) **AFFIDAVIT OF TASHA C. JOSEPH IN**  
) **SUPPORT OF PRELIMINARY**  
) **OBJECTION TO COMPLAINT**  
) **PURSUANT TO Pa.R.C.P. 1028(a)(1)**

) Filed on behalf of Defendants Tasha C.  
) Joseph, individually, and as owner and  
) operator of DONTDATEHIMGIRL.COM,  
) and EMPRESS MOTION PICTURES,  
) doing business as THE CAVELLE  
) COMPANY, INC.  
)

) Counsel of Record for These Parties:  
)

) Robert L. Byer  
) Pa. I.D. No. 25447  
) Duane Morris LLP  
) 600 Grant Street, Suite 5010  
) Pittsburgh, PA 15219  
) (412) 497-1083  
)

) Lida Rodriguez-Taseff  
) Duane Morris LLP  
) 200 South Biscayne Boulevard, Suite 3400  
) Miami, FL 33131  
) (305) 960-2242  
)



9. Neither I nor The Cavelle Company, Inc. have any offices in the Commonwealth of Pennsylvania.

10. Neither I nor The Cavelle Company, Inc. have agents or employees in the Commonwealth of Pennsylvania.

11. Neither I nor The Cavelle Company, Inc. own or lease property in the Commonwealth of Pennsylvania.

12. Neither I nor The Cavelle Company, Inc. have any bank accounts in Pennsylvania.

13. Neither I nor The Cavelle Company, Inc., conduct business in Pennsylvania.

14. I have never traveled to Pennsylvania for business purposes.

15. No agent or employee of The Cavelle Company, Inc. has ever traveled to Pennsylvania for business purposes.

16. I have only traveled to Pennsylvania on one occasion, for recreation purposes.

17. Less than 5% of the profiles posted on DontDateHimGirl.com have originated from residents of Pennsylvania.

18. DontDateHimGirl.com does not specifically solicit residents of Pennsylvania to post profiles or purchase items from the online store.

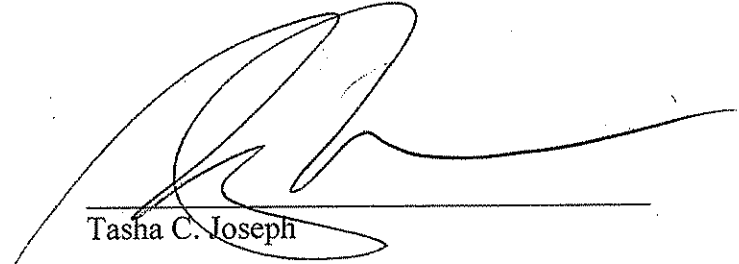
19. The online store at DontDateHimGirl.com has sold approximately \$200.00 worth of merchandise to residents of Pennsylvania, which is less than 5% of the online store's total sales.

20. DontDateHimGirl.com sells space on its web site to individuals and companies for advertising purposes.

21. None of the advertisements present on DontDateHimGirl.com specifically targets residents of Pennsylvania.

22. None of the individuals or companies that advertise on DontDateHimGirl.com resides in the Commonwealth of Pennsylvania.

July 17, 2006

  
Tasha C. Joseph

SWORN TO AND SUBSCRIBED BEFORE ME

in Miami, Florida on July 17, 2006.



**Karol Ecker**

Commission # DD420957

Expires: APR. 20, 2009

www.AARONNOTARY.com

Notary Public

*Miami-Dade County.*

**CERTIFICATE OF SERVICE**

I certify that I am serving the foregoing Affidavit of Tasha C. Joseph in Support of Preliminary Objection to Complaint Pursuant to Pa. R.C.P. 1028(a)(1) today as follows:

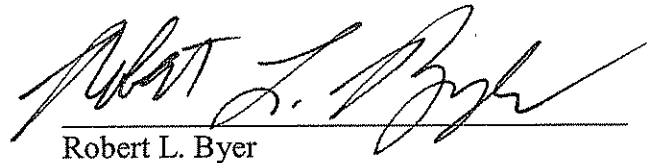
**BY HAND DELIVERY:**

John R. Orie, Jr., Esquire  
Orie & Zivic  
25<sup>th</sup> Floor, Lawyers Building  
Pittsburgh, PA 15219

**BY FIRST CLASS MAIL:**

Ms. Carolyn Meritt Lattimore  
471 Walnut Street  
Pittsburgh, PA 15238-3352

Ms. Alescia Roskov  
531 Franklin Avenue  
Pittsburgh, PA 15221-2803

  
Robert L. Byer

July 19, 2006