

DECLARATION OF CAROL ANDRADE

I, Carol Andrade, declare:

I am the current estate manager for Rob and Sheryl Lowe (the "Lowes"). I have personal knowledge of all the facts stated herein, except as to those stated on information and belief, and if called and sworn as a witness at trial or at any other proceeding, would and could competently testify as set forth herein.

I have been the estate manager for the Lowes for approximately the last eighteen months, and have worked with the Lowes for approximately 12-13 years, on and off, in different capacities. I have also traveled with the Lowes including a trip to London in 2005, during which time we lived in London for several months. I have lived on the Lowes' estate in a guest house since becoming the estate manager and work Monday through Friday, and when needed, on the weekends. Because of my position, I am familiar with the day-to-day interaction among the staff and with the day-to-day interaction between the staff on the one hand and the Lowe family on the other. During the last year and a half that I have been the estate manager, the Lowe Family has resided at the estate and has been there on a daily basis except when they went on family vacations, which usually lasted a week or two. As a result, I was able to observe the Lowes in various situations on a regular and ongoing basis.

As the estate manager, I supervise all employees and independent contractors at the estate, including nannies, chefs, drivers, and housekeepers. My duties include, among other things, maintaining the personnel files, paying the staff, counseling and disciplining the staff when issues of performance and conduct arise. Because of my position and history with the Lowes, I am familiar with the day-to-day interaction among the staff and with the day-to-day interaction between the staff on the one hand and the Lowe family on the other. Employees understand that they may report to me any work-related issues and, to the best of my knowledge, do so.

I am informed that a former nanny of the Lowes, Jessica Gibson, has accused Rob and Sheryl of inappropriate behavior. With respect to Rob, I have been informed that Jessica has claimed that he sexually harassed her. With respect to Sheryl, I have been informed that Jessica has claimed that Sheryl made inappropriate comments of a sexual and racial nature to Jessica. In addition, Jessica claims that Sheryl made inappropriate comments involving the Lowes' two sons.

Rob and Sheryl have never mistreated me nor have I ever seen them mistreat any other employee. Sheryl and I have a very good working relationship and often joke around with each other and other employees. I have never been offended by any of the jokes or comments that Sheryl has made in my presence.

Rob has never made any sexual advances toward me, nor have I ever seen him make any sexual advances toward any employee or any third party, nor did any employee or third party ever tell me that Rob had made such advances toward them. In addition, no employee ever told me, formally or informally, that they witnessed, or were subject to, inappropriate or

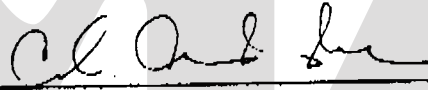
offensive conduct or comments by Sheryl. No employee ever told me, either formally or informally, that Sheryl's comments made them feel uncomfortable.

During the period that I have worked for the Lowes, Jessica voluntarily quit her position as nanny to the Lowes' two sons twice during the last few years, and then returned to work as a nanny for the Lowes. She told me both times that she left because she was getting burned out with the job. The first time that she left was two and a half years ago she returned to work for the Lowes nearly nine months later. She told me when she returned to work for the Lowes that she did not like the work environment for the other employer, a doctor's office. The second time she left was approximately nine months and she returned to work for the Lowes about five months later and told me when she returned that she had wanted to work more hours than her employer was giving her. On each of these occasions, Jessica left and returned to work on good terms with me and the Lowes.

Jessica never told me, either formally or informally, that Rob ever said or did anything that she found inappropriate or offensive or that made her feel uncomfortable. She never told me, either formally or informally, that Rob had made sexual advances toward her. She also never told me, either formally or informally, that she witnessed or was subject to inappropriate or offensive conduct or comments by Sheryl or that she was uncomfortable or offended by Sheryl's conduct or comments.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 7, 2008, Santa Barbara, California.



CAROL ANDRADE