

JOHNSTONE, SKOK & LANE
A PROFESSIONAL CORPORATION
Counsellors At Law
324 East Broad Street
Westfield, New Jersey 07090
(908) 233-9000
Attorneys for Plaintiff Amber Hill Farm, LLC

AMBER HILL FARM, LLC,

Plaintiff,

vs.

SAMANTHA LAWTON-DUTHIE,
RATEMYHORSEPRO.COM, JOHN
DOE 1 (PUREPONY), JOHN DOES
2-5, JANE DOE 1 (PREMIER PONY
MOM), AND JANE DOES 2-5,
Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – SOMERSET COUNTY

Docket No.: SOM-L-001229-12

CIVIL ACTION

**CERTIFICATION OF I. BLAKELEY
JOHNSTONE III IN SUPPORT OF
MOTION TO BE RELIEVED AS
COUNSEL**

I, I. BLAKELEY JOHNSTONE III, of full age, certify as follows:

1. I am an attorney at law of the State of New Jersey. I represent the plaintiff, Amber Hill Farm, LLC, in the within matter and am familiar with the facts and circumstances herein.

2. From the inception of my representation of the plaintiff in this matter, it was understood by and between myself and Elizabeth Mandarino, principal of Amber Hill Farm, LLC, that my participation would be limited. Prior to becoming involved, I explained to her that the issues involved were unique to her industry and outside my area of expertise.

Mrs. Mandarino explained that she had retained the services of a law firm in Virginia which specialized in legal issues pertaining to the industry within which Amber Hill operates. That firm was ready and willing to prosecute this matter on her behalf. The understanding was that I would file the complaint in New Jersey, and then prepare the paperwork to admit the Virginia firm *pro hac vice*.

3. However, before the *pro hac vice* application had been prepared, defendant Rate My Horse Pro filed a motion to dismiss the complaint. Working with the Virginia firm, I responded to that motion. Thereafter, defendant Samatha Lawton-Duthie also filed a motion to dismiss the complaint, which I also responded to in conjunction with the Virginia firm.

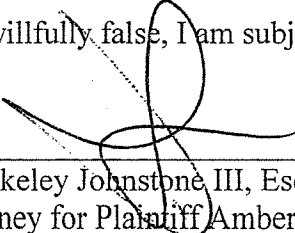
4. It is my understanding that, just prior to oral argument on the latter motion to dismiss, there was some sort of falling out between Elizabeth Mandarino and the attorneys in Virginia. I was informed by Mrs. Mandarino that they would no longer be involved in this matter.

5. I immediately conferred with Mrs. Mandarino regarding what had been agreed to between us as far as my limited role in the within matter, and she confirmed to me that she understood and agreed. Mrs. Mandarino indicated that Amber Hill would find other counsel to proceed with the matter. I have correspondence confirming this understanding. These can be made available to the Court at your request.

6. Several months have passed and I have been in contact with the plaintiff in this regard and have recently been informed that new counsel has become involved with her affairs. His name is Paul Hollander from the firm Okin, Hollander and Deluca. Whether or not he is retained in this matter is Mrs. Mandarino's decision. However, Mrs. Mandarino has indicated to me that she does not oppose the within application.

7. Given the above, it is my belief that it is in the best interests of the plaintiff and myself to be relieved as counsel at this early stage in the litigation.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



I. Blakeley Johnstone III, Esq.
Attorney for Plaintiff Amber Hill Farm, LLC

Dated: 6/17/13

CERTIFICATE OF MAILING

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Johnstone, Skok & Lane, PC.
2. On July 23, 2013, the undersigned prepared and forwarded copies of the within correspondence to the following parties via Federal Express:

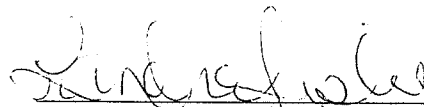
Motions Clerk,
Somerset County Superior Court
40 North Bridge Street
Somerville, NJ 08876-1262

3. On July 23, 2013, the undersigned prepared and forwarded copies of the within correspondence to the following parties via regular mail:

Richard L. Ravin, Esq.
HARTMAN & WINNICKI, P.C.
W. 115 Century Road, Suite 120
Paramus, New Jersey 07652

Leslie A. Farber, Esq.
Law Offices of Leslie A. Farber, Esq.
33 Plymouth Street, Suite 204
Montclair, New Jersey 07042-2607

4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment



Sandra Lipke, Legal Secretary