

## **Affidavit of Diana M. Hausam**

I will testify that Rachel Neeley provided shelter and the required care of life like maintaining personal hygiene, etc. for Curtis from 2006-2008 and several times he was very near dying. He underwent surgery to remove nearly half his bottom due to a pressure sore and once had both legs amputated above the knee due to pressure sores. He said that he was told he would never be able to get from his bed to a wheelchair without assistance and a Hoyer. I witnessed his getting out of bed by himself using the Hoyer in July 2006.

Curtis believes he was wronged incredibly by the photo.net owners. I believe any photographer would be if anyone else claimed rights to display photos they asked them not to keep showing even if at one time they were OK with it and submitted them. I believe any photographer would be offended greatly by their nude photographs being commandeered like I see being done by photo.net to Curtis' art nudes. This offends Curtis a great deal and I believe it would offend anyone.

Curtis has a severe traumatic brain injury and although he was ruled to be legally competent his memory is still severely reduced and it was not till around June 2008 that I helped him move out to live more on his own. On June 30<sup>th</sup> 2008 he was finally, marginally able to survive on his own. Curtis still requires daily aides provided by Medicaid to assist him with preparing meals, taking showers, changing catheters, shopping, and transportation. Curtis does not survive completely by himself and may never. I was aware that he was extremely troubled by his website domains being taken.

He has not been able to act until now due to his severe mental and physical disabilities. I visited Curtis once in the hospital when he underwent a surgery that resulted in him staying in a nursing home to recover for about a month. Curtis advised me then that he was extremely upset by his domain names being stolen but figured they would not be sold till he could act on his own because the thieves were asking about a thousand dollars for them. Curtis is extremely adept at search engine optimization and spends a great deal of time online.

Curtis is very particular about photographs that involve the nude figure and has explained it in great detail to me. He has raw record files from curtisneeley.com showing every IP that visited his site since May 06, 2005 and the reports that he ran to demonstrate NameMedia was aware of his distress by visiting his site are not manipulated in any way and were extracted from them. The IP of NameMedia is known and I see them as regular visitors in 2009 or this year.

The above statements are true and correct to the best of my knowledge and belief.

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Date

**Witness of Signature**

**State of Arkansas**

**County of Washington**

**On this \_\_\_\_ day of December 2009.**

**Before me the undersigned notary public, Diana Michelle Hausam personally appeared and proved to me with an Arkansas driver's license that Diana Michelle Hausam signed the document above.**

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Signature of notary public

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Date my commission expires