

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MYA SARAY, LLC,

Plaintiff,

v.

AL-AMIR, INC.,

&

ALI HAMMOUD,

Defendants.

Civil Action No. 1:10-cv-789

Declaration of Daryn Rollins

I, Daryn Rollins, declare that if called to testify, I would testify to the best of my information and belief as follows:

1. I have personal knowledge of all facts set forth in this Declaration and, if called upon, could competently testify to those facts. I am over 18 years of age and am qualified to testify.

2. On March 28, 2011, I accompanied counsel for Mya Saray, LLC, M. Keith Blankenship ("Blankenship"), to the distribution facility of Al-Amir, Inc. ("Al-Amir") at 15322 West Warren Ave. Dearborn, Michigan 48126 where I met Ali Hammoud ("Hammoud") for a Rule 34 Inspection. Blankenship and I were permitted to inspect the premises.

3. Blankenship requested that Hammoud provide access to multiple products listed in exhibits to this declaration.

4. Blankenship showed Hammoud the photograph of Exhibit A and requested access to the hookahs depicted therein. Hammoud stated that after the litigation commenced that he had thrown away all of the remaining hookahs depicted in Exhibit A.

5. Blankenship showed Hammoud the photograph of Exhibit B and requested access to the hookahs depicted therein. Hammoud stated that after the litigation commenced that he had thrown away all of the remaining hookahs depicted in Exhibit B.

6. Blankenship showed Hammoud the photograph of Exhibit C and requested access to hookahs depicted therein. Hammoud stated that he had none of these remaining.

7. Blankenship showed Hammoud the photograph of Exhibit D and requested access to hookahs depicted therein. Hammoud stated that he had about 1,000 of these hookahs at one time but after the litigation commenced that he had thrown away all of the remaining hookahs depicted in Exhibit D. Hammoud further explained that the stems of the hookah of Exhibit D were genuine Mya Saray stems remaining from lingering Mya Saray inventory while the remaining components were not from Mya Saray.

8. After inspecting the premises at 15322 West Warren Avenue Dearborn, Michigan 48126, at Blankenship's request we were taken to a large warehouse at 6650 Chase Road, Dearborn, MI 48126, the tax records for which indicate ownership by a Hussein Hammoud.

9. The Chase Road warehouse was filled with hookahs, hookah components, and hookah tobacco. Blankenship asked Hammoud during the inspection of the Chase Road warehouse if any of the products of Exhibits A-D were available at the Chase Road warehouse. Hammoud indicated that they were not available.

10. Exhibits E-H are photographs that I took with my camera of the interior of the Chase Road warehouse and are true and accurate depictions thereof.

11. Subsequent to reviewing the premises at 6650 Chase Road, Dearborn, MI 48126 Blankenship and I were introduced to George Ismail, who represented that he was previously employed by Al-Amir, Inc. and without lead or assistance could describe in intricate detail the items and publicly inaccessible areas that Blankenship and I had recently inspected.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed this April 15, 2011

By:

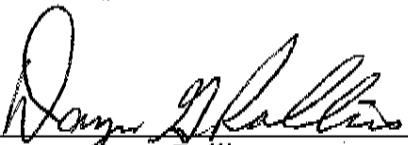

Daryn Rollins

Exhibit A



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Exhibit B



Exhibit C



Exhibit D



Exhibit E



Exhibit F



Exhibit G



Exhibit H



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7. Blankenship showed Hammoud the photograph of Exhibit D and requested access to hookahs depicted therein. Hammoud stated that he had about 1,000 of these hookahs at one time but after the litigation commenced that he had thrown away all of the remaining hookahs depicted in Exhibit D. Hammoud further explained that the stems of the hookah of Exhibit D were genuine Mya Saray stems remaining from lingering Mya Saray inventory while the remaining components were not from Mya Saray.

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