

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LEONARD ROWE, ROWE
ENTERTAINMENT, INC., LEE KING,
and LEE KING PRODUCTIONS, INC.,

Plaintiffs,

-against -

GARY, WILLIAMS, PARENTI,
WATSON AND GARY, P.L.L.C.,
WILLIE E. GARY, SEKOU M. GARY,
MARIA SPERANDO, and LORENZO
WILLIAMS,

Defendants.

Civil Action File No.
1:16-CV-01499-MHC

**DECLARATION OF
LEE KING IN OPPOSITION
TO MOTIONS TO DISMISS
OR TRANSFER**

LEE KING declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a plaintiff in this lawsuit and I was a plaintiff in the underlying lawsuit in which Willie Gary and the other defendants (the “Gary Lawyers”) represented me and other black concert promoters asserting race discrimination and antitrust claims against talent/booking agents and white concert promoters, *Rowe Entertainment, Inc., et al. v. The William Morris Agency, Inc., et al.*, 98 Civ. 8272 (RPP) (S.D.N.Y.) (the “Civil Rights Action”).

2. I submit this declaration in opposition to the Gary Lawyers’ motions to dismiss.

3. I have read the accompanying declaration of Leonard Rowe executed on September 5, 2016. I confirm that Mr. Rowe's declaration is true to the best of my personal knowledge.

4. Mr. Rowe took the lead among the plaintiffs in the Civil Rights Action in dealing with our lawyers and monitoring the course of litigation. Mr. Rowe participated in almost every significant event during the litigation of the Civil Rights Action. He attended most, if not all, of the depositions and court hearings, for example. He always kept me and the other Civil Rights Plaintiffs informed of developments, however, and he scheduled regular strategy phone calls with us so we could make decisions collectively.

5. I also attended several in-person meetings and hearings. All of the Civil Rights Plaintiffs, for example, attended the December 2002 strategy meeting with the Gary Lawyers at the Atlanta Hilton hotel described in paragraphs 38 through 40 of Mr. Rowe's declaration. I confirm that his description of that meeting is correct. Several of the Gary Lawyers attended that meeting, including Willie Gary, Maria Sperando, and Sekou Gary.

6. I also traveled to Gary's Florida office in or around April 2003 to assist in the preparation of the opposition to the summary judgment motions filed by the defendants in the Civil Rights Action. Mr. Rowe's description of the meeting with the Gary Lawyers at which we discussed modifications to the 2001

retainer agreement is accurate. I recall, for example, Mr. Rowe questioning why disputes between us and Gary had to be resolved under New York law in New York court. As reported by Mr. Rowe, Gary responded that the law required New York law and New York court – that we had no choice in the matter.

7. Since Mr. Rowe and I filed our RICO action against the Gary Lawyers in March 2015, we have been contacted by many of Gary's former clients reporting similar fraud and gross malpractice. Many of Gary's former clients, most of them African Americans, travelled to Atlanta to attend the March 10, 2016 hearing in that action. They attended because they want the Gary Lawyers to finally face the consequences of their greed, malpractice, and fraud.

8. As Mr. Rowe described, the loss of the Civil Rights Action has been devastating to the few black concert promoters still in business. My work dried up after the case was dismissed and I have been struggling financially ever since.

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

Executed: September 5, 2016
Ridgeland, Mississippi



LEE KING