

IN THE SUPREME COURT OF NOVA SCOTIA
BETWEEN:

**Trout Point Lodge, Limited, a Nova Scotia Limited
Company**

Plaintiff

-and-

**Louisiana Media Company, LLC, a Delaware Limited
Liability Company**

Defendant

AFFIDAVIT OF ROY M. D'AQUILA

I affirm and give evidence as follows:

1. My name is Roy M. D'Aquila and I am a person of the full age of majority and domiciled in Jefferson Parish, Louisiana. I am a licensed attorney at law in the State of Louisiana, United States of America.
2. I have personal knowledge of the statements given in this Affidavit, except where otherwise stated to be based upon information and belief.
3. I state herein the source of any information that is not based upon my own personal knowledge and I likewise state my belief in the source.
4. I have known Aaron Broussard since the year 1981.
5. I am a member of Nova Scotia Enterprises, L.L.C., a Louisiana Limited Liability Company which purchased a building and joining lands as well as an adjacent lot located at 140 Trout Point Road, Kemptville, Nova Scotia. I am likewise a partner in Kempt Wilderness Lodge Services, a Canadian Partnership which owns the building and lands located at 7 Trout Point Road.
6. I live in the Parish of Jefferson, State of Louisiana, which is part of the New Orleans Metropolitan area. I watched the 9:00 p.m. evening news on WVUE T.V. Fox 8 between January 6 and January 10, 2010.
7. On or about January 7 or January 8, 2010, I recall watching Fox 8 news at 9:00 p.m. which contained a news report on a complaint about Aaron Broussard to the New Orleans Metropolitan Crime Commission.
8. I recall an interview with Aaron Broussard that was featured on the 9:00 p.m. news, and Mr. Broussard was interviewed by a female news reporter at Fox 8. I believe that her name was Val Bracy.

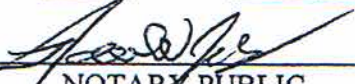
127

9. On either this news report or the news report on one or more subsequent evenings, Fox 8/WVUE television featured pictures of Trout Point Lodge in the context of news reports and likewise showed a picture of Trout Point Lodge on the television station website.
10. I recall getting distressed and angry because Fox 8 continually showed pictures of Trout Point Lodge and identified it as property owned by Aaron Broussard and I knew upon information and belief that Aaron Broussard did not have any ownership interest in Trout Point Lodge.
11. As a viewer, I would have believed and had the impression that Aaron Broussard was an owner of Trout Point Lodge, and it was a further implication that this property was rented to Jefferson Parish Contractors.
12. I recall that these reports continued for a period of two or three days starting on the evening of January 6, 2010. There may have been additional reports aired about this matter subsequent thereto.
13. After the news coverage on WVUE/Fox 8 about the Trout Point Lodge, and the fact that Aaron Broussard owned properties in Nova Scotia, the members of Nova Scotia Enterprises, L.L.C. decided within a period of 90 days that they wanted to sell the property which was in close proximity to Trout Point Lodge described herein as 140 Trout Point Road.
14. Based upon the vote of a majority of the members of Nova Scotia Enterprises, L.L.C., I proceeded to list the property located at 140 Trout Point Road as well as an adjacent lot and an adjacent island lot for sale with Sharon Fraser of 1761 Realty Limited. I also contacted Vaughn Perret at Trout Point Lodge to see if the lodge would be interested in buying the property.
15. The decision of the members of Nova Scotia Enterprises, L.L.C. to sell the property was influenced by the stories concerning Trout Point Lodge which appeared on Fox 8/WVUE.
16. These statements are made based upon my personal knowledge of various facts as well as on information and belief.



ROY M. D'AQUILA

SWORN TO AND SUBSCRIBED BEFORE
ME THIS 3 DAY OF OCTOBER, 2011.



NOTARY PUBLIC
BAR ROLL #: 13038
PARISH OF JEFFERSON
STATE OF LOUISIANA

BY COMMISSIONER'S ISSUED FOR LIFE

128