

DECLARATION OF GARY SHOEFIELD

I, Gary Shoefield, declare as follows:

1. This Declaration is based upon my personal knowledge and personal participation in the events described. If called to testify as a witness, I could and would testify competently as follows:
2. I worked for filmOn TV, Inc. and Hologram USA as an entertainment consultant. At FilmOn, I was a Senior Vice President of Contend. At Hologram USA, I was a Senior Vice President for Business Development.
3. I was so employed when Elizabeth B. Taylor and Mahim Khan were employed by FilmOn TV, Inc. I occasionally interacted with Elizabeth B. Taylor and Mahim Khan when they worked directly for me.
4. I understand that Elizabeth B. Taylor is accusing Alki David, the President and CEO of FilmOn TV, Inc and of Alki David Productions, Inc., of sexual harassment in regard to Ms. Taylor. I never observed Ms. Taylor being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I never observed Mr. David inappropriately touching Ms. Taylor or using any crude language around her or in any way acting inappropriately around her. I never observed anyone inappropriately touching Ms. Taylor or acting inappropriately around her.
5. A one point, Mahim Khan came to me to complain that someone at FilmOn TV was sexually harassing her, including touching her breasts. I asked her to give me that person's name, and I told her that I would speak to that person and make sure that behavior stopped. Ms. Khan never gave me the name of the person whom she alleged had sexually harassed her. I also told her to go see Yelena Calander in human resources and file a sexual harassment complaint. Ms. Khan never spoke with Ms. Calendar. She never permitted me to talk to the person allegedly sexually harassing her, and she never went to Ms. Calendar in human resources to file a complaint. I never understood why Ms. Taylor would make such a claim and not allow me to

take action on her behalf or why she never pursued reporting the incident herself.

6. I understand that Mahin Khan is also accusing Alki David of sexual harassment, including inappropriate touching. I never observed any sexual harassment in regard to Ms. Khan. I never observed Ms. Khan being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I never observed Mr. David inappropriately touching Ms. Khan or using crude language around her or in any acting inappropriately around her. No one else at the offices ever told me that Ms. Khan was being sexually harassed or inappropriately touched by anyone in the workplace.

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

Executed in Malibu, California on July 25, 2022.

Gary Shoefield