I, DONNA SHEA, of the City of Oshawa, in the Region of Durham, in the Province of Ontario

DO SOLEMNLY DECLARE THAT:

- 1. I am the Vice-President of Randy Potter Auctioneer Ltd. known as Randy Potter Estate Auction and formerly known as Kahn Auctions.
- Mr. Donald Robinson frequently attended auctions during the timeframe between late 1999 and early 2000. He both purchased and bid on numerous paintings by Norval Morrissoau.
- 3. Mr. Donald Robinson made a number of attempts to discover the source and contact name of the Norval Morrisseau paintings being auctioned at Kahn Auctions during this timeframe.
- 4. Mr. Donald Robinson was concerned about the number of Norval Morrisseau paintings being sold at Kahn Auctions and cautioned us to slow down the number of paintings being sold as he could not sell them as quickly at his gallery.

AND I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under oath and by virtue of the Canada Evidence Act.

DATED this // . day of March, 2005.

DONNA SHEA