

Exhibit A

DECLARATION OF MICHAEL C. BLAIR

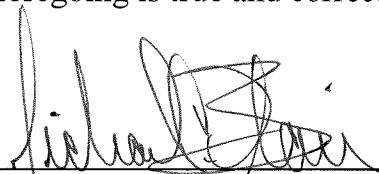
I, Michael C. Blair, hereby declare:

1. I am one of the attorneys for the defendants in a consolidated case pending before the Maricopa County Superior Court at case no. CV2014-015333.
2. On January 14, 2016, I traveled to Christopher Callahan's offices at Fennemore Craig in Phoenix. Mr. Callahan represents the plaintiff in this consolidated action. At that meeting, Mr. Callahan and I discussed plaintiff's responses to defendants' non-uniform interrogatories. The emails between me and Mr. Callahan following that meeting are attached as exhibit C to defendants' motion to compel.
3. Despite personal consultation and good faith efforts to do so, Mr. Callahan and I were unable to satisfactorily resolve this discovery matter.
4. Defendants need the names of all current and former members of plaintiff's golf club. Defendants have no way to get that information other than to obtain it from plaintiff.
5. Information about current and former membership is believed to be within plaintiff's exclusive control.
6. Defendants believe that many former members were allowed to depart the club either without paying a transfer fee or were allowed to pay a significantly reduced fee.

7. Defendants served non-uniform interrogatories to obtain the information, but plaintiffs refused to produce anything responsive. Defendants have filed a motion to compel asking the court to order plaintiffs to provide complete responses to the interrogatories.
8. Assuming the court grants the motion to compel and orders plaintiff to provide complete responses within ten days after its order, defendants will then still need time to review the information, contact possible witnesses, and take depositions as needed to obtain admissible evidence to use in response to plaintiff's motions. It is conservatively estimated that it will take approximately 60 days after the date when plaintiff provides complete responses to defendants' non-uniform interrogatories for defendants to conduct the necessary discovery to prepare and file a response to the motions.

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

Dated this 26th day of January 2016.



Michael C. Blair