

In addition, co-counsel and I participated in a “meet-and-confer” with and at ABIM’s counsel office on March 3, 2016, which lasted slightly more than two hours.

The parties have been unable to reach agreement despite this good faith effort, thereby necessitating the accompanying Motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2016.

s/ Andrew L. Schlafly

Andrew L. Schlafly (AS4533)

Attorney at Law

939 Old Chester Rd.

Far Hills, NJ 07931

Phone: (908) 719-8608

Fax: (908) 934-9207

Email: aschlafly@aol.com

Attorney for Defendant, Counterclaim Plaintiff, and Third-Party Plaintiff Jaime Salas Rushford, M.D.