

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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GMAC BANK, a Utah Industrial Bank,	)	
	)	CIVIL ACTION
Plaintiff,	)	
	)	
vs.	)	No. 06 CV 5291
	)	
HTFC CORPORATION,	)	
	)	
Defendant.	)	

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**AFFIDAVIT OF AARON WIDER**

The undersigned, being first duly sworn under oath, hereby deposes and states as follows:

1. My name is Aaron Wider. I am the president of HTFC Corporation, the defendant in this case. If called to testify, I could testify truthfully to all matters stated herein.
2. I submit this Affidavit in support of Joseph R. Ziccardi, who represented HTFC Corporation in this case and who has been sanctioned in this case due to my conduct.
3. I have had the opportunity to consult with, and have consulted with, counsel other than Mr. Ziccardi regarding this matter, and I make this Affidavit of my own free will and with the knowledge that, among other things, I may be solely responsible for the sanctions ordered against me.
4. Prior to my deposition on September 26, 2007, I had numerous conversations and I met for hours with my attorneys, Joseph R. Ziccardi and Raymond Voulo in preparation. During those meetings, both of my attorneys advised me of the proper conduct for the deposition and cautioned me against improper language, profanity, name-calling and other inappropriate behavior. Even though they told me what to expect, I nevertheless disregarded their advice and responded as I wanted.

5. During the deposition on September 26, 2007, I became very agitated and responded by lashing out at plaintiff's counsel, often times calling him names or using profanity. My attorneys repeatedly advised me during the breaks that I must stop such conduct and answer the questions asked, but I refused to take their advice. Over and over they asked me to simply respond to the questions asked of me without using expletives or interjecting other irrelevant material, but I failed to do this.

6. As the deposition continued, during the breaks my attorneys cautioned that my conduct was damaging my case and that I was making it very difficult to provide a proper defense. They further warned me that if I did not discontinue my abusive conduct and provide direct answers to the questions asked, I may be sanctioned or fined, or judgment may be entered against HIFC. I nevertheless continued my combative behavior, to use profanity and argue with plaintiff's counsel. Neither Mr. Ziccardi nor Mr. Voulo encouraged me to act this way; to the contrary, they explicitly told me to behave, cooperate, and answer the questions asked.

7. After the September 26, 2007 deposition ended that day, I again met with both of my attorneys to prepare for my testimony the following day in a related case. Both of them harshly reprimanded me for my conduct during the deposition. They again stressed the importance of my responding to the questions asked and cooperating with plaintiff's counsel to complete the deposition.

8. On September 27, 2007, I completed my deposition in a related case. That deposition occurred without incident, and I did not use profanity, argue with counsel or act combatively. I answered the questions that were asked.

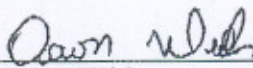
9. My deposition in this case was continued on November 8, 2007. Prior to that deposition, I again met with both Mr. Ziccardi and Mr. Voulo. During this meeting, both

attorneys instructed me that I could not repeat the conduct at the September 26, 2007, that it was of critical importance that I maintain my composure at all times and respond to the questions asked. They instructed me that I would not get another chance, and that if I failed to adhere to these rules, I would definitely be fined, and it was highly likely that HTFC would lose this case. I understood these instructions and promised to control myself.

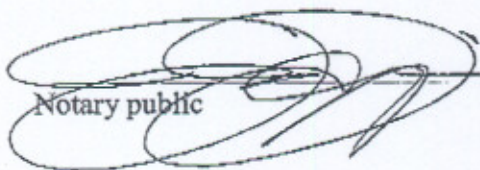
10. At the November 8, 2007 deposition, even though my attorneys had instructed me to cooperate, I failed to do so and resumed my belligerent behavior. We again took numerous breaks during this deposition during which my attorneys warned me that I would undoubtedly be penalized for my conduct, yet I continued in the same manner. They further told me that I must answer questions that were asked, and that my refusal to do so would result in a judgment against HTFC, as well as the loss of my counterclaim.

11. I have repeatedly apologized to Mr. Ziccardi, as I accept full responsibility for my conduct, and he did everything he could to stop me from behaving improperly during the depositions but I refused to listen to him or listen to his advice, despite my repeated promises to the contrary.

Further Affiant sayeth naught.

  
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Aaron Wider

Subscribed and sworn to before me  
this 14<sup>th</sup> day of March 2008.

  
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Notary public

JAMES ROBERT FILIPPONE  
Notary Public, State of New York  
No. 01F18139480  
Qualified in Nassau County  
COMMISSION EXPIRES 10/31/2010  
01/09/10