

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF ST. MARY

BEFORE ME, the undersigned authority, duly commissioned and qualified in the State of Louisiana and the Parish of St. Mary, personally came and appeared,

BETTY D. BLANCHARD

who, being first duly sworn deposed and said;

That John H. Conery, Attorney (hereinafter referred to as "Conery"), legally representing only myself before and/or during that litigation entitled, "Betty D. Blanchard et al versus ARCO et al", St. Mary Parish, Louisiana (Court Docket No. 77,796) composed, signed and caused to be delivered a revocation letter dated December 13, 1994 (Exhibit "A") to Paul Maclean (hereinafter referred to as "Maclean").

That before composing, signing and/or delivering that letter, Conery did not first apprise me of any and/or all the facts and/or issues that caused him to send said letter under my purported authority, nor did he make me aware of and/or obtain my agreement to its contents, nor did he obtain my execution of that letter to evidence my agreement to its contents and/or transmittal, nor did he ever transmit a copy of that letter to me either before and/or after he transmitted it to Maclean. That, in-fact, the first time I have viewed this December 13, 1994 letter is on signing this Affidavit.

That it is my understanding that by the preparation and delivery of that revocation letter, which Conery purported to Maclean and others to be of my authority and instruction, Conery revoked the long-standing Power of Attorney and Agency relationship first verbally entered into and authorized by me with Maclean on April 30, 1986 and further evidenced by a written agreement with Maclean signed May 5, 1986 pursuant to the delivery of my Demand Letter to ARCO et al and the resulting above-titled litigation.

Prior to Conery's sudden involvement on my part in August of 1994, Maclean and I had acted alone in a concerted agreement and effort as it related to my property and that litigation. That on November 8, 1994 Conery first informed me that Maclean no longer wished to be a part of that litigation (using Conery's own words "Paul wants out"). That during the preceding eight (8) years all decisions related to that litigation were made solely and in concert by Maclean and myself and that Maclean was the sole person to whom I entrusted such decisions. That after such trust all those years to be told that "Paul wants out" shocked me. I was disappointed, hurt and angry at Maclean for deserting me in that litigation.

EXHIBIT R

That from the time Conery advised me of the purported abandonment by Maclean until at least the execution of the final settlement documents of that litigation I was told repeatedly, in particular by Conery, but also by my other attorneys in that litigation G. Tim Alexander, III, Jack C. Caldwell, Cameron B. Simmons and/or Dale H. Hayes, that Maclean, for his own benefit, had chosen to remove himself from his role as my Agent with my Power of Attorney, that Maclean did not wish to speak with me on the matter and that it was imprudent and/or inadvisable that I contact him in any manner. Indeed, I was told that Maclean was making decisions to benefit himself that were in direct opposition to and/or against my best interests or those of my property and/or my minerals with regard to that litigation. I was never informed by G. Tim Alexander, III, Jack C. Caldwell, Cameron B. Simmons and/or Dale H. Hayes that prior to Maclean's purported resignation Conery had first sent that December 13, 1994 revocation letter on my behalf nor at any time did any one of these attorneys ever show me a copy of that revocation letter, ask me whether I had actually authorized that letter, discussed and/or explained to me the facts which surrounded Conery's preparation of said letter on my behalf, and/or the legal ramifications and/or effect of said letter to either Maclean, myself and/or the litigation and/or its outcome.

That until today I have never before viewed the subject revocation letter attached to this Affidavit which was transmitted by Conery to Maclean on December 13, 1994 under my purported authority, and I hereby denounce and object to its intentionally deceitful use, purpose, content and transmittal on December 13, 1994 and thereafter by Conery and/or my other named attorneys.

WITNESS:

AFFIANT:

Marcy V. DeSalte

Lydia Simpson

Betty D. Blanchard
BETTY D. BLANCHARD

Sworn to and subscribed before me this 15th day of September, 2000

Betty V. ...
NOTARY PUBLIC

JOHN E. CONERY
A Professional Law Corporation
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Franklin, Louisiana 70538

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December 13, 1994

VIA FACSIMILE

Mr. Paul Maclean
Maclean Land Services, Inc.
P. O. Box 3620
Houma, LA 70361

Re: Blanchard v. ARCO

Dear Paul:

As has been explained to you on several occasions, Jack Caldwell does not have and never did have a conflict of interest in this case. Because he had done some prior work for John Hine he did not want Mr. Hine to later claim any type of potential conflict of interest so he wanted a letter of pre-clearance from Mr. Hine to avoid any potential unforeseen future problem. Jack in no way has ever represented Mr. Hine or Tortuga or anybody else in this lawsuit on any issue relating to this litigation and, as I understand it, he is unaware that any possible future problem could develop. His request to his prior client to give him a clearance letter was done out of an abundance of caution and out of courtesy to a former client. Mr. Caldwell has now undertaken to represent Betty and has no conflict of interest and, as I understand it, will have no conflict of interest. He has obtained a clearance letter from his former client's attorney to that effect.

As I understand our prior correspondence, you have been and are unwilling to pay the future costs of this litigation. Because of that, your Power of Attorney has been revoked and you are no longer able to act on Betty's behalf nor incur any expenses for or on her behalf, or take any action whatsoever without her express written permission. As Betty's attorney, we represent her and have been trying to get an accounting of your agency from you. This is not a third party request, but rather a direct request from the lady with whom you have a contractual relationship. A letter signed signed by Betty to that effect was sent to you several

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Mr. Paul Maclean
Re: Betty Blanchard
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months ago. Betty has every right to demand the information that you have accumulated over the years and to demand an accounting from you. We have made that demand on countless past occasions and herewith repeat it.

Thanking you, I am

Sincerely,



John E. Conery

JEC/arj