

EXHIBIT B

4. I subsequently taught Constitutional and Employment law at several law schools including Loyola Marymount, University of Utah, and Cleveland State University.

5. Before joining Conrad & Scherer in 2008, I was General Counsel and Executive Director of the International Labor Rights Forum (ILRF), where I directed the ILRF's legal and advocacy work and also developed legislative proposals.

6. I am also a founder and Executive Director of the International Rights Advocates.

7. I opened the Conrad & Scherer office in Washington D.C. in approximately May, 2008.

8. The office I head up for Conrad & Scherer in Washington D.C. is small. We primarily operate separately from the main Fort Lauderdale office of Conrad & Scherer and are almost exclusively focused on litigating our human rights cases that I brought to the firm when I joined. The staff working on our cases does not spend a lot of their time on cases originating out of the Fort Lauderdale office. Likewise, the lawyers and staff in Fort Lauderdale generally work on their cases and have very little input on the human rights cases.

9. Virtually all of our cases in the D.C. office are human rights cases in which we represent foreign nationals who have been injured by U.S. multinationals in their offshore operations. In all of these cases, the large defendant companies retain one or more large law firms to defend them, and we consequently litigate in the challenging environment in which our opponents have virtually unlimited resources and we represent mostly indigent clients with a small team of dedicated and often overworked human rights lawyers.

10. Often I must rely on interns and volunteers from the human rights organizations we work with to help with my cases.

11. Currently, I am lead counsel for the plaintiffs in *Balcero v. Drummond Co., Inc.*, No. 2:09-cv-1041-RDP (N.D. Ala. filed May 27, 2009); *Baloco v. Drummond Co., Inc.*, No. 7:09-cv-0557-RDP, (N.D. Ala.); and *Melo v. Drummond Co., Inc.*, No. 2:13-cv-0393-RDP (N.D. Ala. filed Feb. 26, 2012). I also currently represent clients in major cases against Exxon Mobil, Chiquita Brands International, Dole Food Company, Occidental Petroleum, Nestle USA, Inc., Archer Daniels Midland Company, Cargill Incorporated, Doe Run and DynCorp.

12. The *Drummond* cases are complex cases dealing with allegations that Drummond collaborated with paramilitary terrorists in Colombia to murder and torture trade union leaders and many innocent civilians who lived near Drummond's facilities in Colombia.

13. These cases are particularly complicated because they are dealing with the laws of a foreign country and witnesses subject to threats from paramilitary terrorists.

14. Although many of the cases I work on concern matters in Colombia or other South American countries, I do not speak Spanish.

15. I often work through employees who speak Spanish or third party translators when I deal with witnesses and attorneys in Spanish-speaking countries.

16. A question has been raised about an \$80,000 payment to Ivan Otero. The \$80,000 was paid to Mr. Otero as a retainer with the understanding that he would use the funds for travel expenses, security, and lost income replacement.

17. A question has also been raised about security payments sent to Jose Pinzon. Security payments were sent to Jose Pinzon for the benefit of Halcon because Mr. Pinzon had a bank account in Colombia. Halcon, who fled to Panama for safety, did not have a bank account there.

18. In regard to the timing of statements by Jaime Blanco Maya, Mr. Blanco made statements to prosecutors, and to myself and Mr. Otero, about Drummond's collaboration with the AUC before May 2011.

19. Sometimes witnesses or potential witnesses would report threats to themselves or their families. We did provide witness protection to some of these witnesses who had their lives threatened. We had to protect them and did.

20. There are also a number of witnesses who gave testimony adverse to Drummond, who, as far as I am aware, did not receive direct or indirect witness payments from me or my firm.

21. I recognize I would not be before this Court facing these allegations and there would be no issue with my conduct if I had previously told the Court that I could provide more information even if it required me to review documents and get back to the Court. I could have given the Court more complete and accurate answers to its questions.

22. My inaccurate statements have had serious repercussions for myself, my cases, my firm, and my family.

23. As a human rights defender for most of my career, I have always worked for relatively little income. I currently receive a small salary that allows me to maintain my family. My wife is an artist who brings home little income. We have two kids in college and my family cannot withstand me receiving a significant financial penalty.

24. My incorrect statements have also caused problems in other human rights cases I am involved in, particularly the Dole and Chiquita cases where the defendants and their counsel are closely coordinating their tactics with Drummond.

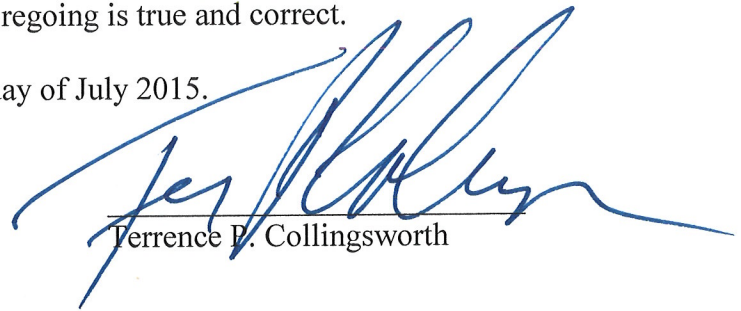
25. I am concerned human rights plaintiffs in multiple cases could be prejudiced if I am sanctioned before a trial on the merits in this case can take place where, I hope, the entire truth of

my conduct, as well as Drummond's, will be established. This would have an impact on my ability to effectively and vigorously prosecute these other cases. I accepted many of the human rights cases that I currently have because most other lawyers would not take on these large, risky cases and the victims needed effective representation. If I am not able to represent them effectively, I do not think they could find other counsel to step in.

26. This is not the first time an opponent has sought sanctions against me but to date, no sanctions against me have ever been upheld on appeal.

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

Executed in Washington, D.C. on the 15th day of July 2015.



Terrence P. Collingsworth