

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ESTATE OF GEORGE BERNARD WORRELL, JR.,
Plaintiff,
-against-
THANG, INC. and GEORGE CLINTON,
Defendants.

Index No. 652872/2019

**AFFIDAVIT OF
GEORGE CLINTON**

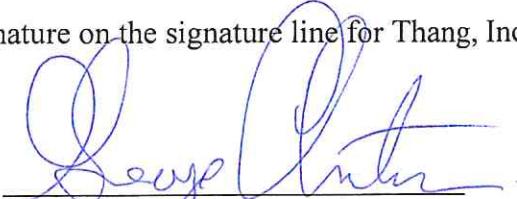
State of Louisiana)
) ss:
County of Calcasieu)

GEORGE CLINTON, being duly sworn, deposes and says:


1. I am a defendant in this action and submit this affidavit in support of the defendants' motion to dismiss the First Amended Complaint.
2. I have seen a copy of Exhibit A to plaintiff's First Amended Complaint, which purports to be a copy of a January 1, 1976 music royalties agreement between Bernie Worrell and defendant Thang, Inc. The document is signed by or on behalf of Bernie Worrell but has no signature on the signature line for Thang, Inc.
3. If there ever was such an agreement between Bernie Worrell and Thang, Inc., it was not contained in a writing that was signed by or on behalf of Thang, Inc.
4. The alleged agreement is dated 44 years ago and to the best of my knowledge and recollection, I did not sign the original or a copy of the document either on behalf of Thang, Inc.

or for myself. I also have no knowledge of anyone else having signed this purported agreement for or on behalf of Thang, Inc.

5. I do not now have, and to the best of my recollection have never had or seen, a copy of the purported agreement that included a signature on the signature line for Thang, Inc.


GEORGE CLINTON

Sworn to before me this
10 day of January, 2020


Notary Public

Christie Consunado #52134
Louisiana Notary Public
Commissioned for Life