

2009 01T 0732 CP

IN THE SUPREME COURT OF NEWFOUNDLAND & LABRADOR
TRIAL DIVISION

BETWEEN:

**THE ESTATE OF SUSAN PIERCEY, as
represented by KEITH PIERCEY**

PLAINTIFFS

AND:

**ATLANTIC LOTTERY CORPORATION INC. –
SOCIÉTÉ DES LOTERIES DE L'ATLANTIQUE**

DEFENDANT

**BROUGHT UNDER THE *CLASS ACTIONS ACT*
BEFORE THE HONOURABLE MR. JUSTICE DYMOND,
CASE MANAGEMENT JUDGE**

SUPPLEMENTAL AFFIDAVIT OF KEVIN HARRIGAN, PhD

SUMMARY OF CURRENT DOCUMENT

Court File Number:	2009 01T 0732 CP
Date of Filing of Document:	January 2010
Name of Filing Party or Person:	Plaintiffs
Application to which Document being filed relates:	Application of Plaintiffs for certification as a class action.
Statement of purpose in filing:	To support application.

I, Kevin Harrigan, PhD, of the Town of Fergus, in the Province of Ontario, MAKE OATH AND SAY:

1. I make this affidavit further to my affidavit sworn December 9, 2009. I have personal knowledge of the facts stated herein except where stated to be on information and belief and I believe the facts and opinions stated herein to be true.
2. I am informed by class counsel that one of the VLT games Susan Piercey played was a game called "Swinging Bells".

3. I am familiar with the game "Swinging Bells". Swinging Bells is a type of VLT line game often referred to as an "8-liner" game as there are typically eight lines on which the player can wager.

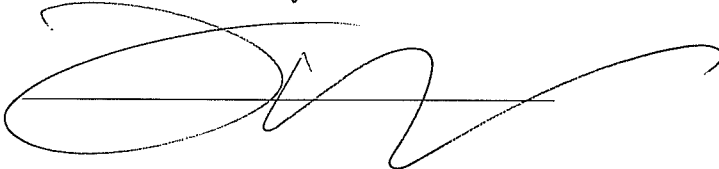
4. I have also reviewed two patents filed in the United States in respect of "8-liner" games in general and "Swinging Bells" in particular.

5. "Swinging Bells" is a VLT line game as those games are described in my earlier affidavit, sworn December 9, 2009.

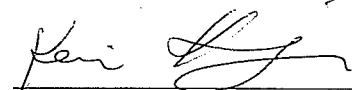
SWORN TO before me at the

CITY OF WATERLOO

in the Province of Ontario, this
13th day of January, 2010.



DAVID J. SCHNURR



KEVIN HARRIGAN