EXHIBIT B

CAUSE NO. 2014-40964

ERIC TORRES, ADAM SINN,	§	IN THE DISTRICT COURT OF
XS CAPITAL MANAGEMENT, L.P.,	§	
AND ASPIRE COMMODITIES, L.P.,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CRAIG TAYLOR AND	§	
ATLAS COMMODITIES, L.L.C.,	§	
	§	
Defendants.	§	157 TH JUDICIAL DISTRICT

AFFIDAVIT OF BARRINGTON M. HAMMOND, JR.

STATE OF TEXAS	§
	§
COUNTY OF HARRIS	§

BEFORE ME, the undersigned, a Notary Public in and for said county and state, on this day personally appeared Barrington M. Hammond, a person whose identity is known to me and who, being duly sworn by me, upon his oath deposed and stated as follows:

- 1. My name is Barrington M. Hammond, Jr. I am more than twenty-one (21) years of age and qualified to make this Affidavit. I have personal knowledge of all facts stated herein and they are true and correct.
- 2. I am an attorney duly authorized to practice law in the state of Texas. My Texas Bar Number is 24059883.
- 3. I am authorized and do make this Affidavit in support of Plaintiffs' assertions of privilege in their responses to Requests for Production of documents. Plaintiffs' responses and production include certain redacted text messages between Adam Sinn and myself in documents bates labelled SINN 000225- SINN 000229.
- 4. During the underlying litigation, Cause No. No. 2012-46745, *Eric Torres v. Craig Taylor, et al.*, v. *Adam Sinn, et al.*, in the 157th Judicial District Court of Harris County, Texas, through the present day, and at all relevant dates of the redacted text messages, I have been a lawyer for Adam Sinn, XS Capital Management, LP, and Aspire Commodities, LP.
- 5. My cellular telephone number is 713-634-8660. The redacted text messages to and from Adam Sinn and I were one-on-one communications to and from a lawyer that were created or made in furtherance of Mr. Sinn's request for professional legal services from me in connection with the prosecution or defense

EXHIBIT B

of claims in the anticipated, which is now this current, litigation. The redacted texts involving phone number 713-634-8660 were not part of group messages, and included only Adam Sinn and I. Such communications were made with the purpose of rendering professional legal services, and constitute attorney-client communications that are privileged under Texas Rules of Evidence 503."

FURTHER AFFIANT SAYETH NOT.

Barrington M. Hammond, Jr.

oxary Public in and for

The State of Texas

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 28h day of August 2015, to certify which witness my hand and seal of office.

as

JOSEFINA S. GOMEZ lotary Public, State of Texas My Commission Expires

September 19, 2016