

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|------------------------|---|----------------------------|
| _____ |) | |
| JOSE MARIA DeCASTRO, |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C.A. No. 1:25-cv-11610-ADB |
| |) | |
| JOSHUA ABRAMS, |) | |
| DALE HILLER, |) | |
| KATHERINE PETER, |) | |
| JOHN DOES 1 THROUGH 5, |) | |
| Defendants. |) | |
| _____ |) | |

AFFIDAVIT OF DALE HILLER

I, Dale Hiller, under oath, do hereby swear and affirm as follows:

1. I am an individual who, at all times relevant to this lawsuit (i.e., since at least June of 2022), have maintained my domicile in the State of West Virginia.
2. I have never lived in the District of Columbia.
3. I have never lived in the Commonwealth of Massachusetts.
4. I am a YouTube personality that operates the LackLuster YouTube channel.
5. I run the LackLuster YouTube channel through a corporate entity known as LackLuster Media, LLC.
6. LackLuster Media, LLC is a West Virginia limited liability company.
7. I am the sole member of LackLuster Media, LLC.
8. LackLuster Media, LLC was registered in the State of West Virginia and maintains its corporate headquarters in West Virginia.
9. LackLuster Media, LLC has never operated in the Commonwealth of Massachusetts and never maintained a headquarters in the Commonwealth of Massachusetts.

10. Neither I nor LackLuster Media, LLC have ever conducted any business in the Commonwealth of Massachusetts.

11. Neither I nor LackLuster Media, LLC have ever maintained a presence in the Commonwealth of Massachusetts.

12. In fact, I have never personally set foot in the Commonwealth of Massachusetts.

13. I have never recorded any livestream for YouTube in the Commonwealth of Massachusetts.

14. At times, I collaborate with other YouTube personalities. This includes co-defendant Joshua Abrams. Any time I have collaborated with Joshua Abrams, I have done so from West Virginia and never in Massachusetts.

15. I do not consent to being sued in the Commonwealth of Massachusetts and do not waive any jurisdictional defenses I may have.

Signed under the pains and penalties of perjury this 20th day of January, 2026.

/s/ Dale Hiller