

6. In a different genre, I have written a seven-novel Western series about a lawman acting for a federal court, along with eighteen other stand-alone Western novels to date, winning half a dozen national book awards for the historical accuracy of my depiction of the American West.

7. In 2004 I authored *Writing the Popular Novel*, and have also contributed essays about the craft of detective fiction to *Writing Mystery and Crime Fiction* (ed. Sylvia Burack, 2012), *Writing the Private Eye Novel* (Private Eye Writers of America, 1997), and *Writing Mysteries* (Mystery Writers of America, 2002).

8. I have detailed and personal knowledge of the Sherlock Holmes character. My two novels, *Sherlock Holmes vs. Dracula* and *Dr. Jekyll and Mr. Holmes*, originally published in 1978 and 1979 respectively, are still in print today. Last year I published *The Perils of Sherlock Holmes*, a collection of his short stories, and a new collection also edited and authored by me, *Sons of Moriarty and More Stories of Sherlock Holmes*, will be published this November.

9. I am the author of the standard *Complete Sherlock Holmes* paperback edition in America, published by Bantam Books (a Random House division), a work in print (including ebook) since 1986. *The Perils of Sherlock Holmes* contains two nonfiction essays (“Channeling Holmes” and “On the Significance of Boswells”) about Conan Doyle’s Sherlock Holmes and Dr. Watson characters in new fiction by others.

10. For my fiction and nonfiction I have won many literary awards and additional nominations, including an Honorary Doctorate in Letters, and have been the Guest of Honor at a number of literary conventions devoted to the detective and Western fiction genres.

11. I created the characters Amos Walker, Page Murdock, Peter Macklin, and Valentino in 40 books over 34 years. I did not create or fully develop these characters in the first novel in

which they each appeared. In fact, I continue today to develop and create their personalities, traits, likes, dislikes, and identities as I write new novels about each of the characters.

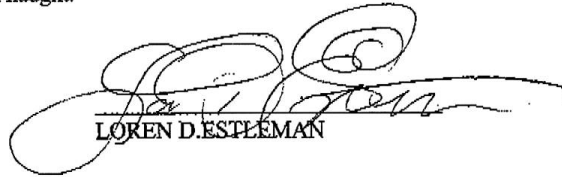
12. I have reviewed “Plaintiff’s Local Rule 56.1(a)(3) Statement of Material Facts in Support of His Motion for Summary Judgment (“Plaintiff’s Statement of Material Facts”) and Defendant’s Rule 56.1(b)(3) Response to Plaintiff’s Statement of Material Facts and Statement of Additional Material Facts (“Conan Doyle’s Statement of Additional Material Facts”), and am personally familiar with their contents.

13. I have personal knowledge of the facts contained in Conan Doyle’s Statement of Additional Material Facts and made in response to the following paragraphs of Plaintiff’s Statement of Material Facts and know them to be true and accurate: ¶¶ 1, 8, 10, 14, 16, 17, 22, and 23.

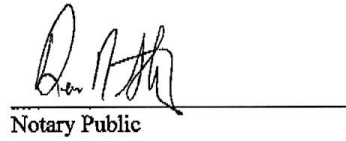
14. I have personal knowledge of the facts contained in the following paragraphs in Conan Doyle’s Statement of Additional Material Facts and know them to be true and accurate: ¶¶ 2, 3, 4, 5, 6, 9, and 10.

[remainder of page intentionally left blank]

Further your Affiant sayeth naught.


LOREN D. ESTLEMAN

The foregoing Affidavit of Loren Estleman was subscribed and sworn before me on
September 7th, 2013.


Notary Public

My commission expires:

2/17/2017

