

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

FIRST JUDICIAL DISTRICT

CASE TYPE: CIVIL

State of Minnesota,

Court File No: 19HA-CV-20-4167

Plaintiff,

vs.

Affidavit of Lisa Monet Zarza

Lionheart, L.L.C.
d/b/a Alibi Drinkery,

Defendant.

Lisa Monet Zarza, after first being sworn under oath, states and alleges as follows:

1. My name is Lisa Monet Zarza. I am a co-owner of the Defendant Minnesota business, Lionheart, L.L.C. d/b/a Alibi Drinkery.
2. The lockdown orders of Governor Walz have devastated our business. We lost 23 of 25 employees and experienced a loss of revenue of in excess of \$350,000.
3. The latest order creates a situation where we could lose our business. Our opposition to these latest orders is one of self-preservation, and my belief, based in part on the advice of counsel (See Alibi's Memo dated December 22, 2020) that the law is on our side – and Governor Walz does not have the authority to do what he is doing.
4. The type of bar/restaurant we are is such that take out orders make up less than five percent of our total revenue. The current executive order as is creates a situation where we literally will go out of business if we do not fight this.
5. Starting as of today, we have closed our doors.
6. For these reasons, and others, we are seeking to have the temporary restraining order dissolved and a request for the temporary injunction to not be granted.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: December 22, 2020

By: /s/Lisa Monet Zarza
Lisa Monet Zarza