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9 ALS SCAN, INC., ALEX KIRN,
10 APIC WORLD-WIDE, INC. and
11 STEVE EASTON

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 GLOBAL INNOVATIONS, INC., a Maryland
15 corporation, and RAMSEY LAMERSON, an
16 individual,
17 Plaintiff,
18 vs.
19 ALS Scan, Inc., a Maryland corporation, WAYNE
20 KIRN, an individual, APIC WORLD-WIDE,
21 INC., a Florida corporation and STEVE EASTON,
22 an individual,
23 Defendants.

Case No.: C03-1277 JSW

**DECLARATION OF AMY LAPERLE IN
SUPPORT OF MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION
(FRCP 12(b)(2)); OR IN THE ALTERNATIVE
TO DISMISS PURSUANT TO THE COURT'S
DISCRETION UNDER 28 U.S.C. §2201; OR
IN THE ALTERNATIVE TO TRANSFER
FOR CONVENIENCE (28 USC §1404(a))**

Date: August 1, 2003
Time: 9:00 a.m.
Courtroom: 2, 17th Floor
Honorable Judge Jeffrey S. White presiding

24 I, Amy LaPerle, do state as follows under penalty of perjury:

25 1. I am over the age of eighteen years and am competent and authorized to make this
26 declaration; which I make voluntarily and freely based on my own personal knowledge of all matters
27 stated herein. . I have personal knowledge of all matters stated herein and if called as a witness, I could
28 testify competently regarding the matters stated.

1 2. I am an employee of ALS SCAN, INC. ("ALS"), in Columbia, Maryland and have been
2 so employed since 2001. I am the employee at ALS who is responsible for obtaining and protecting the
3 copyrights held by ALS.

4 3. ALS currently holds over 100 Certificates of Registration that have been issued by the
5 United States Copyright Office, all of which are located in my office in Columbia, Maryland.

6 4. When it is brought to my attention that one or more of ALS's copyrighted images are
7 being displayed on a website not authorized by ALS, I am responsible for sending a cease and desist
8 notice to both the webmaster and the Internet Service Provide ("ISP") on whose system the website
9 resides.

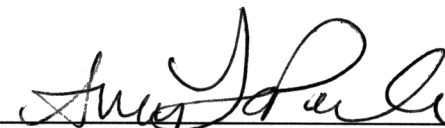
10 5. Between December 2002 and March 2003, I sent approximately twelve cease and desist
11 notices to Ramsey Lamerson by way of either his legal@cleandrive.net e-mail address or his
12 legal@globali.net e-mail address or both.

13 6. I have personally documented hundreds of ALS's copyrights that were being displayed
14 on websites that Global Innovations, Inc. hosted. The images were free to view – I did not need a
15 password to gain access to any of the Web sites. These documents are retained in the ALS offices in
16 Columbia, Maryland.

17 7. I have not been to the state of California while employed at ALS.

18 I declare under penalty of perjury that the foregoing is true and correct.

19
20
21 Executed on June 20, 2003.



Amy LaPerle