

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE HONORABLE OTTO J. REICH and
OTTO REICH ASSOCIATES, LLC,

Plaintiffs,

vs.

LEOPOLDO ALEJANDRO BETANCOURT
LOPEZ, PEDRO JOSE TREBBAU LOPEZ, and
FRANCISCO D'AGOSTINO CASADO,

Defendants.

Defendants' Public Filing

SEALED DOCUMENT

ECF CASE

13 CV 5307 (PJO)

**ATTORNEY'S DECLARATION OF FRANK H. WOHL
IN SUPPORT OF DEFENDANT LEOPOLDO ALEJANDRO BETANCOURT LOPEZ'S
RENEWED MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Frank H. Wohl declares under penalty of perjury as follows:

1. I am a partner of the firm of Lankler Siffert & Wohl LLP, counsel for Defendant Leopoldo Alejandro Betancourt Lopez (Betancourt) in the above-captioned action. I make this declaration in support of Defendant Betancourt's renewed motion to dismiss the remaining claims in the amended complaint (Claims III-VI) pursuant to Fed. R. Civ. P. 12(b)(2).
2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Mr. Betancourt, which was conducted on December 9, 2014 in Palm Beach, Aruba.
3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Leopoldo Alejandro Betancourt Lopez in Support of the Motion by Defendants Leopoldo

Alejandro Betancourt Lopez and Pedro Jose Trebbau Lopez to Stay Obligations to Answer, dated September 4, 2014.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Leopoldo Alejandro Betancourt Lopez in Support of the Renewed Motion to Dismiss the First Amended Complaint, dated December 23, 2014.

5. Attached hereto as Exhibit 4 is a true and correct copy of Mr. Betancourt's membership card from the [REDACTED] Club in Caracas, Venezuela, and a certified translation thereof.

6. Attached hereto as Exhibit 5 is a true and correct copy of Defendant Leopoldo Alejandro Betancourt Lopez's Responses, sworn to October 30, 2014, to Plaintiffs' First Set of Interrogatories.

7. Attached hereto as Exhibit 6 is a true and correct copy of Defendant Leopoldo Alejandro Betancourt Lopez's Supplemental Responses, sworn to December 5, 2014, to Plaintiffs' First Set of Interrogatories.

8. Attached hereto as Exhibit 7 is a true and correct copy of Defendant Leopoldo Alejandro Betancourt Lopez's Responses, sworn to December 5, 2014, to Plaintiffs' Second Set of Interrogatories.

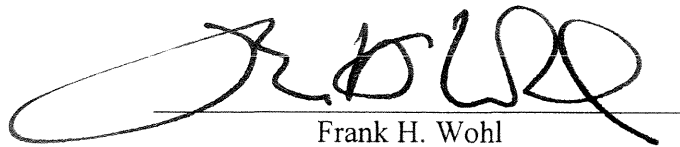
9. Attached hereto as Exhibit 8 are true and correct copies of two vehicle registration certificates issued by the Venezuelan National Institute of Ground Transportation to Mr. Betancourt, and certified translations thereof.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the transcript of the deposition of Defendant Pedro Jose Trebbau Lopez, which was conducted on December 12, 2014 by video conference in Caracas, Venezuela.

11. Attached hereto as Exhibit 10 is a true and correct copy of Defendant Leopoldo Alejandro Betancourt Lopez's Responses, dated December 5, 2014, to Plaintiffs' Second Request for Production of Documents.

12. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: New York, New York
December 23, 2014



Frank H. Wohl