

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 JOSEPH A. DEMARIA TO THE
REPLY MEMORANDUM IN SUPPORT OF THE RENEWED
MOTION BY DEFENDANT PEDRO JOSE TREBBAU LOPEZ
TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Joseph A. DeMaria declares under penalty of perjury as follows:

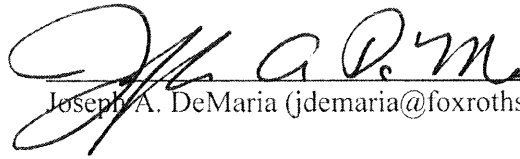
1. I am a partner of the firm of Fox Rothschild LLP, counsel for Defendant Pedro Jose Trebbau Lopez ("Mr. Trebbau") in the above-captioned action. I make this declaration to the Reply Memorandum in support of the Renewed Motion by Defendant Trebbau to Dismiss Claims Third, Fourth, Fifth, and Sixth of Plaintiffs' First Amended Complaint, pursuant to Fed. R. Civ. P. 12(b)(2), for lack of personal jurisdiction.

2. Attached hereto as **Exhibit A** is a true and correct copy Form W-8BEN Certificate of Foreign Status of Beneficial Owner for United States Tax Withholding signed by Pedro Trebbau on May 3, 2009 and a true and correct copy of the J.P. Morgan U.S. Address Explanation signed by Pedro Trebbau on May 3, 2009.

3. These documents were authenticated by Defendant Trebbau as Exhibit 29 to his December 12, 2014 deposition.

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

Dated: Miami, Florida
January 28, 2015


Joseph A. DeMaria (jdemaria@foxrothschild.com)