

EXHIBIT B-1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

BRUCE KIRBY, INC., AND
BRUCE KIRBY,

Plaintiffs,

v.

LASERPERFORMANCE (EUROPE)
LIMITED,
QUARTER MOON, INCORPORATED,
KARAYA (JERSEY) LIMITED,
VELUM LIMITED ITM SA (ANTIGUA AND
BARBUDA),
INTERNATIONAL SAILING FEDERATION
LIMITED
INTERNATIONAL LASER CLASS
ASSOCIATION, and
FARZAD RASTEGAR,

Defendants.

LASER PERFORMANCE (EUROPE)
LIMITED, and
QUARTER MOON, INCORPORATED,

Defendants-Counterclaim Plaintiffs,

v.

BRUCE KIRBY, INC., and
BRUCE KIRBY,

Plaintiffs-Counterclaim Defendants,
and

GLOBAL SAILING LIMITED, and
PERFORMANCE SAILCRAFT PTY. LTD.,

Additional Counterclaim Defendants.

Civil Action No. 3:13-cv-00297 (JAM)

DECLARATION OF
CHRIS CALDECOAT



I, Chris Caldecoat, declare and state as follows:

1. I am over 18 years of age and competent to give this declaration. The following facts are personally known by me to be true and correct and if called as a witness I could and would competently testify hereto under oath;

2. I am the General Manager for Performance Sailcraft Pty. Ltd, ("PSA");

3. As part of my duties as General Manager, I am responsible for monitoring PSA's market competitors;

4. The 1983 and 1989 Builder Agreements are licensing agreements that allow "Licensed Builders," located in separate geographic markets, to build sailboat and sailboat hulls in accordance with the "LASER" construction manual;

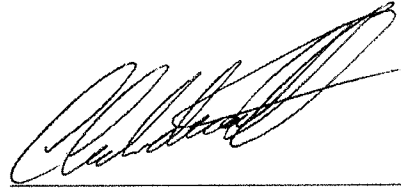
5. PSA is the "Licensed Builder" for the Australian, New Zealand and Oceania markets;

6. LaserPerformance (Europe) Limited ("LPE") was a "Licensed Builder" pursuant to the 1983 Builder Agreement to build sailboat and sailboat hulls in accordance with the "LASER" construction manual, but was not a "Licensed Builder" for the Australian, New Zealand and Oceania markets;

7. Quarter Moon, Incorporated ("QMI") was a "Licensed Builder" pursuant to the 1989 Builder Agreement to build sailboat and sailboat hulls in accordance with the "LASER" construction manual, but was not a "Licensed Builder" for the Australian, New Zealand and Oceania markets;

8. During the time period which LPE and QMI were "Licensed Builders," they were not competitors of PSA;

I declare under penalty of perjury under the laws of the State of Connecticut that the foregoing is true and correct and this Declaration was executed this 07 day of April, 2015.



Chris Caldecoat