

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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	:
BRUCE KIRBY, INC., and	:
BRUCE KIRBY,	:
	:
	:
Plaintiffs,	: Civil Action No. 3:13-cv-00297 (RNC)
-against-	:
	:
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.	:
-----	X

DECLARATION OF THOMAS VON URBISCH

THOMAS VON URBISCH declares, pursuant to 28 U.S.C. § 1746:

1. I am a director of Karaya (Jersey) Limited (“Karaya”), a defendant in this action. I make this declaration in support of Karaya’s Motion to Dismiss the Complaint.
2. This declaration is based on my personal knowledge and my review of documents maintained by Karaya in the ordinary course of business.

Karaya Has No Contacts With Connecticut

3. Karaya is incorporated in Jersey, Channel Islands. Karaya does not have an office in the state of Connecticut.
4. Karaya is not licensed, nor has it ever been licensed, to do business in the state of Connecticut.

5. Karaya does not maintain, nor has it ever maintained, an address or telephone in the state of Connecticut.

6. Karaya does not maintain, nor has it ever maintained, a bank account in the state of Connecticut.

7. Karaya does not have, nor has it ever had, an agent for service of process in the state of Connecticut.

8. Karaya does not employ, nor has it ever employed, persons or agents in the state of Connecticut.

9. Karaya does not solicit business, nor has it ever solicited business, in the state of Connecticut.

10. Karaya does not promote itself, nor has it ever promoted itself, in the state of Connecticut.

11. Karaya employees and agents do not travel regularly, nor have they ever traveled regularly, to the state of Connecticut.

12. Karaya does not pay, nor has it ever paid, income tax in the state of Connecticut.

13. Karaya does not own or lease, nor has it ever owned or leased, any real property in the state of Connecticut.

14. Karaya does not transact business in the state of Connecticut.

The LASER Mark

15. Karaya is the owner of U.S. Trademark Registration No. 1038170 in the United States (the “LASER mark”).

16. Karaya licenses the LASER mark to Quarter Moon Incorporated, a Rhode Island company.

17. Karaya does not manufacture, nor has it ever manufactured, sailboats in the state of Connecticut or elsewhere.

18. Karaya does not control the manufacturing, nor has it ever controlled the manufacturing, of sailboats in the state of Connecticut or elsewhere.

19. Karaya does not sell or distribute, nor has it ever sold or distributed, sailboats in the state of Connecticut or elsewhere.

20. Karaya does not engage, nor has it ever engaged, in any sales of any products in the state of Connecticut.

The BRUCE KIRBY Mark

21. Karaya does not use, nor has it ever used, the “Bruce Kirby” mark in the state of Connecticut, or elsewhere.

22. Karaya does not use, nor has it ever used, Bruce Kirby’s name or likeness in the state of Connecticut, or elsewhere.

23. Karaya does not sell products, nor has it ever sold products, with the “Bruce Kirby” mark in the state of Connecticut, or elsewhere.

I declare under the penalty of perjury of the laws of the United States of America
that the foregoing is true and correct.

Executed on May ____, 2013
Monte Carlo, Monaco

THOMAS VON URBISCH