

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

BRUCE KIRBY, INC., and  
BRUCE KIRBY

Plaintiffs,

vs.

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.

LASERPERFORMANCE (EUROPE)  
LIMITED, and  
QUARTER MOON, INCORPORATED,

Defendants-Counterclaim Plaintiffs,

vs.

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-RNC

**EXHIBIT D TO PLAINTIFFS' OPPOSITION  
TO INTERNATIONAL SAILING FEDERATION LIMITED'S MOTION TO DISMISS**



25 March 2013

Mr Jeff Martin  
Executive Secretary  
International Lass Class Association

Ariadne House  
Town Quay  
Southampton  
Hampshire SO14 2AQ  
UK

Sent by email only: [jcm@laserinternational.org](mailto:jcm@laserinternational.org)

Tel +44 (0)23 80 635111  
Fax +44 (0)23 80 635789  
Email [secretariat@isaf.co.uk](mailto:secretariat@isaf.co.uk)

Dear Jeff

**Supply of ISAF Plaques to LaserPerformance (Europe) Limited and Quarter Moon Inc.**

As discussed with Jason Smithwick earlier today, ISAF requests that ILCA cease to issue ISAF plaques to LaserPerformance (Europe) Limited and Quarter Moon Inc. (the "Builders") with immediate effect.

The reason for this decision is that ISAF has concluded, based on the correspondence and court papers received from Bruce Kirby's attorneys, that the Builders are no longer licensed by Bruce Kirby and/or Bruce Kirby Inc. to build the Laser class boat (as required by the 1983 ISAF Agreement and our 1992 Plaque Agreement). I attach a copy of the letter received on 22 March from Mr Kirby's attorneys confirming that the licences have been terminated and the grounds of termination.

I should be grateful if you could acknowledge receipt of this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jon Napier", is located below the text "Yours sincerely". The signature is stylized and written in a cursive-like font.

Jon Napier  
In-House Counsel

For and on behalf of the International Sailing Federation

**CERTIFICATE OF SERVICE**

This is to certify that on this 23rd day of August, 2013, a true and correct copy of the foregoing **EXHIBIT D TO PLAINTIFFS' OPPOSITION TO INTERNATIONAL SAILING FEDERATION LIMITED'S MOTION TO DISMISS** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

August 23, 2013

Date

/s/ Joan M. Burnett

Joan M. Burnett