CLEMENT DECLARATION IN SUPPORT OF APPLICATION FOR

Doc. 15

I, Christine Clement, declare:

- 1. I have personal knowledge of the facts set forth in this declaration, unless otherwise stated, and I could and would testify competently to them if called as a witness.
- I certify that I am a licensed private investigator under the laws of Quebec,
 Canada. I have been employed since 2001 by Groupe Cantin Geoffrion, a licensed private investigations firm in Montreal, Quebec.
- 3. On or about August 13, 2008 I was assigned to locate Adam Guerbuez, the defendant in this action. I was provided with a physical description of Mr. Guerbuez and his automobile so I could familiarize myself with his appearance and his automobile for purposes of locating him. On August 13, 2008 I personally observed Mr. Guerbuez in Quebec driving in a white Chrysler 300c, similar to the car previously described to me, and frequenting an apartment building located at 7485 Boudreau Terrasse, Lasalle, Montréal Quebec, Canada H8N 2K9.
- 4. On August 14, 2008 at approximately 5:06 pm EST, I personally accompanied Patrick Martin during his service of the Complaint and related papers for this matter upon Adam Guerbuez. Before serving the documents, I heard Patrick Martin ask the individual if he was Adam Guerbuez and the individual confirm that this was his name. I then witnessed Mr. Martin hand the Complaint and related papers to Mr. Guerbuez. Mr. Guerbuez then reviewed the papers and appeared to understand that they were legal documents. During the service, Mr. Martin and Mr. Guerbuez both spoke English. Mr. Guerbuez appeared fluent in the language.
- 5. Rudy Gallo, also an employee of Groupe Cantin Geoffrion, observed, videotaped, and photographed the service of the Complaint papers upon Adam Guerbuez. Attached as **Exhibit A** are true and correct copies of pictures taken just before, during and just after the service of these papers upon Adam Guerbuez. Attached as **Exhibit B** is true and correct copy of a video recording (Manual Filing Notification Regarding Exhibit B: DVD) of the service of these papers upon Adam Guerbuez. I have reviewed the attached photos and video recording. They accurately depict the service of the Complaint and other papers on Mr. Guerbuez.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on October <u>29</u>, 2008, at <u>Seux-Montagnes</u>, <u>Quabec</u>.

Dated: October 29, 2008

Christine Clement
Private Investigator
Groupe Cantin Geoffrion

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