

United States District Court
Southern District of Florida

Case No.: 07-22670 CIV-SEITZ/MCALILEY

Stockwire Research Group, Inc.,
a Florida corporation, and
ADRIAN JAMES, a Texas resident,

Plaintiffs,

vs.

Jonathan Lebed, a Florida resident,
Lebed Biz, L.L.C., a New Jersey Limited
Liability Company, PIGASA, INC., a New
Jersey corporation, and Constance Lebed,
a New Jersey resident,

Defendants.

**DECLARATION OF JONATHAN LEBED IN SUPPORT OF
DEFENDANT CONSTANCE LEBED'S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

1. My name is Jonathan Lebed. I am *sui juris* and make this declaration upon my personal knowledge, except for statements made upon information or belief. I could and would competently testify to the following:
2. My mother is Constance Lebed, a codefendant in this case.
3. At all times relevant to this litigation, I have been the controlling shareholder/member for Pigasa, Inc. and Lebed Biz, L.L.C.
4. As controlling shareholder/member for Pigasa, Inc. and Lebed Biz, I have complete knowledge of all employees or any other persons doing business on behalf of the aforementioned companies.

- 5. Constance Lebed has never been an employee or otherwise conducted any business on behalf of Pigasa, Inc. or Lebed Biz, L.L.C., whether directly or indirectly.
- 6. To the best of my knowledge, Constance Lebed has never conducted any business whatsoever in the State of Florida.
- 7. While living at my mother's home located at 26 Sunset Terrace, Cedar Grove, New Jersey, I personally registered the Lebed.biz domain name.
- 8. While registering the Lebed.biz domain name, I entered the registrant address as 26 Sunset Terrace, Cedar Grove, New Jersey, 07009. I did this without Constance Lebed's knowledge or permission.
- 9. During the month of September 2007, I asked Constance Lebed whether I could borrow her credit card to pay a bill, which she allowed.
- 10. I never informed her of the nature of the bill I intended to pay with her credit card.
- 11. With her credit card, I paid a bill owed to CI Host, relating to the hosting of the Lebed.biz website.
- 12. I never requested that Constance Lebed be listed as the website's owner or contact.
- 13. I am unaware why CI House ever placed Constance Lebed as owner and contact for the Lebed.biz website.

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

12/11/07

 Date



 Jonathan Lebed