

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