

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

William V. Aguiar, III,

Plaintiff,

v.

Floyd Webb,
Barron Sheppard,
Wendy Sheppard,
Ashida Kim a.k.a. Christopher Hunter a.k.a.
Bradford Davis a.k.a. Radford Davis,

Defendant.

Civil Action No. 1:07-cv-11673 MLW

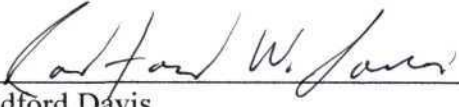
**DECLARATION OF RADFORD DAVIS IN SUPPORT OF RADFORD DAVIS'
MOTION TO DISMISS**

1. I am a resident of Florida.
2. I have never been in the Commonwealth of Massachusetts.
3. I have not offered or contracted to offer services of any kind in Massachusetts.
4. I do not own or lease property in Massachusetts.
5. I do not have bank accounts in Massachusetts.
6. I do not file tax returns in Massachusetts.
7. I am a martial arts expert. I am interested in the martial arts and collect information about martial arts and martial arts history. I own two websites, dojopress.com and ashidakim.com on which I display information about martial arts, martial arts history, and offer martial arts-related merchandise for sale. The information I post on my websites is all produced and displayed utilizing resources outside of Massachusetts.
8. Since January 2006, I have sold approximately 7 books and DVDs from my websites to

persons with Massachusetts addresses. These sales totaled \$267.25, and account for less than one percent (1%) approximately of the sales I made from my websites during this period. None of these sales involved items that would appear to be the focus of this action.

9. I do not disseminate advertising in Massachusetts. My only advertising appears on my websites.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of January 2008, at Winter Haven, Florida.



Radford Davis