North American Karaoke-Works Trade Association, Inc. v. Entral Group International, LLC

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EXHIBIT A

Doc. 56 Att. 1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NORTH AMERICAN KARAOKE-WORKS TRADE ASSOCIATION, INC.

Plaintiff and Counterclaim Defendant,

٧.

ENTRAL GROUP INTERNATIONAL, LLC,

Defendant and Counterclaim Plaintiff,

v.

SAM CHAN and RAY YIM.

Counterclaim Defendants.

Case No. 06-CV-5158 (LTS)(MHD)

DECLARATION OF ROBERT SANDERSON

- 1. I, Robert Sanderson, am over the age of eighteen (18) and am competent to testify to the matters stated herein. I give this Affidavit in support of Entral Group International, LLC's ("EGI") Request for Default Judgment, Permanent Injunction and Impoundment in the above-captioned action to which this Affidavit is attached.
- I am an audio video forensic analyst and the President of Audio Video Forensic Lab. I received my general forensic education from the NY Institute for Forensic Audio in forensic audio, forensic video, voice identification, and court testimony. My specialty, for which I have received specialized training, is forensic analysis of video and audio. I have consulted, and served as an expert witness, in these subjects in the United States. A fuller statement of the foregoing is provided on page 43 to my complete expert report submitted in this case, a true and correct copy of which is attached hereto at Exhibit 1.

3. I have been asked by counsel for EGI to give evidence in the form of an expert report to conduct an examination and comparison of nine musical recordings to determine whether the recordings are sourced from the same master recording. Through my education, training and experience as a forensic analyst, I am familiar with and have professional expertise with respect to generally accepted forensic standards. I have studied and applied such applicable professional standards and requirements of due professional care in fulfilling my responsibilities in examining and comparing the musical recordings which are the subject of EGI's Reply papers. A copy of my complete expert report submitted in this case is attached hereto at Exhibit 1.

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

Executed this day of August, 2007