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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

JAMES S. GORDON, JR., an individual
residing in Benton County, Washington,

Plaintiffs

vs.

IMPULSE MARKETING GROUP, INC.,
a Nevada Corporation,

Defendants

NO. CV-04-5125-FVS

DECLARATION OF SEAN
MOYNIHAN IN SUPPORT
OF MOTION TO
PARTICIPATE PRO HAC
VICE

Sean A. Moynihan now declares that I am one of the attorneys appearing on behalf of the Defendant in the above-entitled matter. My address is 485 Madison Avenue, New York, NY 10022 and my telephone number is (212) 935-6020. I was admitted to practice before the U.S. District Court, Southern District of New York in 1993. Attorney Floyd E. Ivey, 1141 N. Edison, Suite C, Kennewick, WA 99336, (509) 735-3581, is associated as defense counsel in this matter. I have never been subject to any disciplinary sanctions by any Court or bar association.

I certify and declare, under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.


SEAN A. MOYNIHAN
Signed at New York, NY

2-10-05
Date

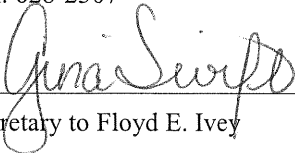
Declaration of Sean A. Moynihan in Support of Motion to Participate Pro Hac Vice - 1

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE
Attorneys at Law
P.O. Box 6125
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(509) 735-3581

1 I hereby certify that a copy of the foregoing was
2 sent via facsimile this 10th day of February, 2005, to:

3 Douglas E. McKinley, Jr.

4 Fax: 628-2307

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6 _____
7 Secretary to Floyd E. Ivey

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