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 4 *Group, Inc., Jeffrey Goldstein and Kenneth Adamson*

Hon. Fred Van Sickle

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*Attorneys for Defendant Impulse Marketing*  
 8 *Group, Inc., Jeffrey Goldstein and Kenneth Adamson*

9  
 10 **IN THE UNITED STATES DISTRICT COURT**  
 11 **FOR THE EASTERN DISTRICT OF WASHINGTON**  
**AT RICHLAND**

12 James S. Gordon, Jr.,  
 13 Plaintiff,  
 14 v.  
 15 Impulse Marketing Group, Inc.,  
 Jeffrey Goldstein, Phillip Huston,  
 16 and Kenneth Adamson,  
 17 Defendants.

Case No.: CV-04-5125-FVS

DECLARATION OF  
 JEFFREY GOLDSTEIN IN  
 SUPPORT OF DEFENDANTS'  
 MOTION TO DISMISS OR, IN  
 THE ALTERNATIVE, FOR A  
 MORE DEFINITE STATEMENT

18 Impulse Marketing Group, Inc.,  
 19 Third-Party Plaintiff,  
 20 v.  
 21 Bonnie F. Gordon, Jamila Gordon,  
 22 James Gordon, III, and Jonathan  
 Gordon,  
 23 Third-Party Defendants.

24 I, Jeffrey Goldstein, hereby declare, under penalty of perjury, as follows:

25 1. I am a defendant in the above-entitled action.

26  
 27 DECLARATION OF JEFFREY GOLDSTEIN  
 IN SUPPORT OF DEFENDANTS' MOTION  
 TO DISMISS OR, IN THE ALTERNATIVE,  
 28 FOR A MORE DEFINITE STATEMENT - 1  
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KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.  
 485 MADISON AVE., 15<sup>TH</sup> FL., NEW YORK, NY 10022  
 (212) 935-6020

1           2.     I am a citizen of the United States and am over the age of eighteen. I  
2 have personal knowledge of the facts set forth in this declaration.

3           3.     I am a resident of the State of Georgia. I am not now, nor have I ever  
4 been, a resident of the State of Washington.

5           4.     I do not personally conduct business in the State of Washington, and I  
6 have never visited the State of Washington.

7           5.     I do not own property in the State of Washington, nor do I have any  
8 business or personal bank accounts within the State of Washington.

9           6.     I have not personally sent email messages to James S. Gordon, Jr.  
10 (“Gordon”) or to Gordonworks.com, and no email messages were sent to Gordon or  
11 Gordonworks.com on my behalf.

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

14 DATED this 30<sup>th</sup> day of August, 2006.

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17 Jeffrey Goldstein  
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