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THE HON. JOHN C. COUGHENOUR

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, SEATTLE

JAMES S. GORDON, Jr., a married individual; OMNI INNOVATIONS, LLC., a Washington limited liability company,

Plaintiffs,

v.

VIRTUMUNDO, INC, a Delaware corporation, d/b/a ADNOWLEDGEMAIL.COM; ADKNOWLEDGE, INC., a Delaware corporation, d/b/a ADKNOWLEDGEMAIL.COM; SCOTT LYNN, an individual; and JOHN DOES, I-X,

Defendants.

NO. CV06-0204JCC

DECLARATION OF ROBERT J. SIEGEL IN RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

[SEALED DOCUMENT]

I Robert J. Siegel state and declare as follows:

- 1. I am counsel of record for Plaintiffs in this matter.

DECLARATION OF ROBERT J. SIEGEL IN RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
GORDON v. VIRTUMUNDO GROUP, INC.

i.Justice Law, P.C.
1325 Fourth Ave., Suite 940
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Phone: 206-304-5400
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1 2. Attached hereto as **Exhibit "A"** are true and correct copies of numerous complaints by
2 recipients of unwanted commercial email from both Defendants Virtumundo and
3 AdKnowledge, which copies were provided in response to Plaintiff's discovery requests.
4 These documents were designated as "Confidential" by Defendants, and accordingly are
5 filed under Seal. (The documents are submitted herewith in accordance with this Court's
6 Minute Order of 12/19/06.)

7
8 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is
9 true and correct.

10 SIGNED this 12th day of February, 2007, at Seattle, Washington.

11 **i.Justice Law, P.C.**

12 /s/ Robert J. Siegel

13 ROBERT J. SIEGEL, WSBA #17312

Attorney for Plaintiff

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on this 12th day of February, 2007, I electronically filed the
16 DECLARATION OF ROBERT J. SIEGEL IN RESPONSE TO DEFENDANTS' MOTION
17 FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF System
which will send notification of such filing to the following:

18 Attorneys for Defendants: Derek A. Newman, Newman & Newman .

19 Robert J. Siegel, WSBA
20 WSBA #17312
ATTORNEY FOR PLAINTIFFS
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25 DECLARATION OF ROBERT J. SIEGEL IN
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