

MERKLE SIEGEL & FRIEDRICHSEN, P.C.
Robert J. Siegel
1325 Fourth Ave., Suite 940
Seattle, WA 98101
(206) 624-9392

THE HON. JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, SEATTLE

**JAMES S. GORDON, Jr., a married
individual, d/b/a
'GORDONWORKS.COM',**

Plaintiff,

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
JAY GORDON**

**IN SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Jay Gordon, declares as follows:

1. I, Jay Gordon am over the age of 18, of sound mind, and am otherwise competent to

DECLARATION OF JAY GORDON
IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL
SUMMARY JUDGMENT
DISMISS GORDON v. VIRTUMUNDO GROUP, INC.

MERKLE SIEGEL & FRIEDRICHSEN
1325 Fourth Ave., Suite 940
Seattle, WA 98101
Phone: 206-624-9392
Fax: 206-624-0717

1 testify.

2 I am and have been since November, 1978, a Washington State resident.

3 Since June 17, 2005, I have been the registrant of the internet domains 'celiajay.com' and
4 'jaycelia.com'.

5 All email addresses at the 'celiajay.com' and 'jaycelia.com' domains are held by Washington
6 State residents. List addresses: celia@celiajay.com; jay@celiajay.com; puumba@
7 celiajay.com; and temon@celiajay.com; celia@jaycelia.com; jay@jaycelia.com; pummba@
8 jaycelia.com; and temon@jaycelia.com.

9 At all times since I registered the 'celiajay.com' and 'jaycelia.com' domains the information
10 of my Washington residency, has been available through my domain registrar, and directly from
11 me to anyone who would inquire.

12 My domain is hosted by Omni Innovations, LLC on its server.

13 I have received multiple commercial emails sent to email addresses at my domain from
14 defendants in this lawsuit.

15 I swear under the penalty of perjury under the laws of the State of Washington, that the
16 foregoing is true and correct.

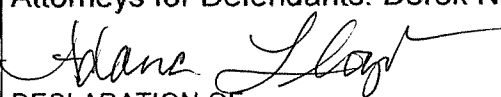
17 EXECUTED this 14th day of December, 2006

18
19 
Jay Gordon

22 Certificate of Service

23 I, hereby, certify that on December 18, 2006, I filed this affidavit with this Court via
24 approved electronic filing, and served the following:

Attorneys for Defendants: Derek Newman

25 
DECLARATION OF
IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL
SUMMARY JUDGMENT
DISMISS GORDON v. VIRTUMUNDO GROUP, INC.

MERKLE SIEGEL & FRIEDRICHSEN
1325 Fourth Ave., Suite 940
Seattle, WA 98101
Phone: 206-624-9392
Fax: 206-624-0717