

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

VERIZON TRADEMARK SERVICES LLC;
and VERIZON LICENSING COMPANY,

Plaintiffs,

v.

Case No. 8:10-cv-00665-VMC-EAJ

THE PRODUCERS, INC.; INTERCOSMOS
MEDIA GROUP INC. d/b/a DIRECTNIC.COM;
DIRECTNIC, L.L.C.; DIRECTNIC LTD.;
DOMAIN CONTENDER, L.L.C.; SIGMUND J.
SOLARES; MICHAEL H. GARDNER;
NOAH S. LIESKE; and DOES 1-10,

Defendants.

DECLARATION OF SIGMUND J. SOLARES

1. My name is Sigmund J. Solares. I make this Declaration based on personal knowledge.
2. In June of 2006, I moved from Louisiana to Tampa, Florida. I purchased the house located at 3618 W. Horatio Street, Tampa, Florida 33609 (the "Tampa House") and declared it my homestead.
3. I do not own the house located at 1517 Hall Avenue, Metairie, Louisiana, nor have I ever resided there.
4. Since on or prior to July of 2009, my business and personal affairs have caused me to travel extensively throughout the world. For this reason, I have been in Tampa, Florida for only brief periods since that time.
5. Since July of 2009, I have operated a company based in Grand Cayman, Cayman Islands. The company's business website is accessible world-wide. I frequently travel throughout

the world to meet with clients, potential clients, and business associates, and to attend business conferences in my role with the company.

6. My business affairs cause me to spend substantial time in the Cayman Islands and Europe.
7. I did not receive the Notice of Lawsuit and Request to Waive Service of Summons that the Plaintiffs assert was delivered to the Tampa House.
8. I have not received, nor have I rejected delivery of, the Summons and Amended Complaint that the Plaintiffs assert they mailed, by certified mail, to me at the Tampa House on October 13, 2010.
9. I have never asked any of my neighbors at the Tampa House to pick up mail from the Tampa House.
10. During the period from March 17, 2010 to April 9, 2010, I was in Europe predominantly for business purposes.
11. During the period from April 23, 2010 to May 5, 2010, I was in Milan, Italy predominantly for business purposes.
12. During the period from May 5, 2010 to May 22, 2010, I was in Miami, Florida for personal vacation.
13. During the period from May 22, 2010 to June 3, 2010, I was in Aruba predominantly for business purposes.
14. During the period from June 3, 2010 to June 14, 2010, I was in Miami, Florida for personal vacation, except for the period of June 5, 2010 to June 12, 2010 when I was on a cruise in the Caribbean Islands.

15. During the period from June 19, 2010 to June 30, 2010, I was in the Netherlands predominantly for business purposes.
16. During the period from August 22, 2010 to August 27, 2010, I was in Ireland predominantly for business purposes.
17. During the period from August 27, 2010 to September 2, 2010, I was in Boston, Massachusetts predominantly for business purposes.
18. Since the filing of this law suit, I have not attempted to avoid service of process in this case, nor have I in any way attempted to conceal my whereabouts. I have traveled extensively during this time solely to conduct my business and personal affairs. The business and personal travel I engaged in during this time is consistent with the travel I have engaged in since July of 2009.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed in Brussels, Belgium on November 9, 2010.


SIGMUND J. SOLARES