

MERKLE SIEGEL & FRIEDRICHSEN, P.C.  
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(206) 624-9392

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, 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  
Anthony Potts**

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

Anthony Potts, declares as follows:

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

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

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Fax: 206-624-0717

1 tesury.

2 2. I am and have been since February 28, 1995, a Washington State resident.

3 3. Since July 19, 2005 I have been the registrant of the internet domain 'anthonycentral.com'.

4 4. All email addresses at the 'anthonycentral.com' domain are held by Washington State  
5 residents. During the time the emails in question from Defendants were received.

6 amra@anthonycentral.com

7 ant@anthonycentral.com

8 chuck@anthonycentral.com

9 dewayne@anthonycentral.com

10 jessica@anthonycentral.com

11 nora@anthonycentral.com

12 sandy@anthonycentral.com

13 tachler@anthonycentral.com

14 tj@anthonycentral.com ]

15 5. At all times since I registered the 'anthonycentral.com' domain the information of my  
16 Washington residency, and other email users at "anthonycentral.com" has been available through  
17 my domain registrar, and directly from me to anyone who would inquire.

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

19 7. I have received multiple commercial emails sent to email addresses at my domain from  
20 defendants in this lawsuit.

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

23 EXECUTED this 17th day of December, 2006

24  
25 DECLARATION OF  
IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL  
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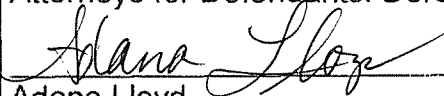
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Anthony Potts 

Certificate of Service

I, hereby, certify that on December 19, 2006, I filed this affidavit with this Court via approved electronic filing, and served the following:

Attorneys for Defendants: Derek Newman

  
Adana Lloyd

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