

Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COINLAB, INC., a Delaware Corporation

Plaintiff,

v.

Mt. GOX KK, a Japanese corporation, and
TIBANNE KK, a Japanese corporation.

Defendants.

NO. 2:13-cv-777-MJP

DECLARATION OF ROGER
TOWNSEND IN SUPPORT OF
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER

I, Roger M. Townsend, hereby declare as follows:

1. I am an attorney at Breskin Johnson & Townsend, PLLC, and counsel for Plaintiff Coinlab, Inc. ("Coinlab") in the above-captioned action. I am a member in good standing with the bar of the State of Washington. I am over the age of eighteen, can attest to the following matters from personal knowledge, and if called as a witness, could competently testify to the matters set forth herein.
2. Attached hereto as **Exhibit 1** is a true and correct copy of an organizational chart filed in the bankruptcy proceeding; Case No. 14-31229-SGJ15, Doc. 127, Page 48 of 72, Filed 05/23/2014.
3. Tibanne has not provided any additional disclosures or otherwise provided notice of compliance with the requirements in the TRO.

1 4. Attached hereto as **Exhibit 2** is a true and correct copy of a report
2 provided by a third party regarding domain names owned or controlled by Tibanne.

3 I declare under the penalty of perjury under the laws of the United States of
4 America that the foregoing is true and correct.

5 DATED this 18th day of August, 2014.

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7 BRESKIN JOHNSON & TOWNSEND PLLC

8 By: /s/ Roger M. Townsend
9 Roger M. Townsend, WSBA #25525
10 1000 Second Avenue, Suite 3670
11 Seattle, WA 98104
12 Phone: 206-652-8660
13 Facsimile: 206-652-8290
14 rtownsend@bjtlegal.com

CERTIFICATE OF SERVICE

1 I hereby certify that on August 18, 2014, I electronically filed the foregoing with
2 the Clerk of the Court using the CM/ECF system which will send notification of such
3 filing to all counsel of record.
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5
6 /s/ Jamie Telegin
7 Jamie Telegin, Legal Assistant
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