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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

LYCURGAN, INC., a California corporation, d/b/a Ares Armor, Plaintiff, vs. B. TODD JONES, as Director of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, EARL GRIFFITH, an individual, UNKNOWN NAMED TECHNOLOGIST, an individual, UNKNOWN NAMED AGENTs I-VII, individuals, and DOES I-XI, in their individual capacities.	Case No.: 14-cv-00548-JLS-BGS **DECLARATION OF DIMITRIOS KARRAS IN SUPPORT OF REPLY ON MOTION TO FILE SUPPLEMENTAL COMPLAINT.** Hon.: Judge Janis L. Sammartino Dept.: 4A Date: October 30, 2014 Time: 1:30 P.M.

DECLARATION OF DIMITRIOS KARRAS

I, DIMITRIOS KARRAS, declare as follows:

1. I am the CEO of Plaintiff Lycurgan, Inc. ("Lycurgan") in the above captioned case, and if called before this court or any other court I could and would testify competently to the following from my own personal knowledge,

except as to those matters I state on information and belief, and as to those matters I believe them to be true.

2. This declaration is made in support of Lycurgan's reply brief on its amended motion for leave to file a supplemental/amended complaint pursuant to Federal Rules of Civil Procedure section 15(d).

3. Lycurgan Inc., is a California corporation which maintains its "principal place of business" in San Diego County, California, within the meaning of 28 U.S.C. § 1391(c). According to section 1391(c)(2), Lycurgan is a "resident" of the Southern District of California.

4. The Southern District of California is the judicial district in which a substantial part of the events or omissions giving rise to the claims set forth in the proposed amended complaint occurred within the meaning of 28 U.S.C. § 1391(b)(2) and 28 U.S.C. § 1391(e)(1)(B).

5. No "real property" as that term is used in 28 U.S.C. § 1391(e)(1)(C) is involved in this action.

I declare under the penalty of perjury according to the laws of the United States, that the foregoing is true and correct and that this declaration was signed on October 23, 2014, in the County of San Diego, California.

DIMITRIOS KARRAS