

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                        |   |  |
|------------------------|---|--|
| JUSTIN ALEXANDER, INC. | ) |  |
|                        | ) |  |
| Plaintiff,             | ) | Case No. 1:15-cv-10089                   |
|                        | ) |  |
| v.                     | ) | <b>Judge Sharon Johnson Coleman</b>      |
|                        | ) |  |
| JACK CHAN, et al.,     | ) | <b>Magistrate Judge Michael T. Mason</b> |
|                        | ) |  |
| Defendants.            | ) |  |
| <hr/>                  |   |  |

**DECLARATION OF RICHARD J. HOLMES**

I, Richard J. Holmes, of Charlotte, North Carolina, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the States of North Carolina and Vermont, the United States District Court for the Western District of North Carolina and the United States District Court for the District of Vermont. I have been admitted to appear *pro hac vice* in this matter on behalf of Plaintiff, Justin Alexander, Inc. (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. I hereby certify that the Defendants in this case have failed to plead or otherwise defend this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).

3. In coordination with Plaintiff’s expert witness in this case, I investigated the infringing activities of the Defendants, including attempting to identify the registrant of each associated domain name and its contact information. Our investigation confirmed that the Defendants are primarily domiciled in China and overseas. As such, I am informed and believe that the Defendants are not active-duty members of the U.S. armed forces.

4. Genuine and authentic copies of the unpublished decisions cited in the corresponding Memorandum of Law in Support of Plaintiff's Motion for Entry of Default and Default Judgment are attached hereto as Exhibit 1.

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

Dated this 20th day of January, 2016



---

Richard J. Holmes  
818 Water Wheel Court  
Charlotte, North Carolina 28209  
Tel. 704.999.9564  
[counterfeitlaw@gmail.com](mailto:counterfeitlaw@gmail.com)

*Counsel for Plaintiff, Justin Alexander, Inc.*