

1 Liebler, Ivey, Conner, Berry & St. Hilaire
By: Floyd E. Ivey
2 1141 N. Edison, Suite C
P.O. Box 6125
3 Kennewick, WA 99336
*Local Counsel for Defendants Impulse Marketing
Group, Inc., Jeffrey Goldstein and Kenneth Adamson*

Hon. Fred Van Sickle

5 Klein, Zelman, Rothermel & Dichter, L.L.P.
By: Sean A. Moynihan
6 485 Madison Avenue, 15th Floor
New York, NY 10022
7 (212) 935-6020
*Attorneys for Defendant Impulse Marketing
Group, Inc., Jeffrey Goldstein and Kenneth Adamson*

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF WASHINGTON**
AT RICHLAND

12 James S. Gordon, Jr.,
13 Plaintiff,
14 v.
15 Impulse Marketing Group, Inc.,
Jeffrey Goldstein, Phillip Huston,
16 and Kenneth Adamson,
17 Defendants.

Case No.: CV-04-5125-FVS

DECLARATION OF
KENNETH ADAMSON IN
SUPPORT OF DEFENDANTS'
MOTION TO DISMISS OR, IN
THE ALTERNATIVE, FOR A
MORE DEFINITE STATEMENT

18 Impulse Marketing Group, Inc.,
19 Third-Party Plaintiff,
20 v.
21 Bonnie F. Gordon, Jamila Gordon,
22 James Gordon, III, and Jonathan
Gordon,
23 Third-Party Defendants.

24 I, Kenneth Adamson, hereby declare, under penalty of perjury, as follows:

25 1. I am a defendant in the above-entitled action.

1 2. I am a citizen of the United States and am over the age of eighteen. I
2 have personal knowledge of the facts set forth in this declaration.

3 3. I am a resident of the State of Georgia. I am not now, nor have I ever
4 been, a resident of the State of Washington.

5 4. I do not personally conduct business in the State of Washington, and I
6 have never visited the State of Washington.

7 5. I do not own property in the State of Washington, nor do I have any
8 business or personal bank accounts within the State of Washington.

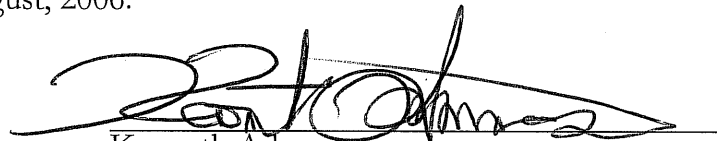
9 6. I have not personally sent email messages to James S. Gordon, Jr.
10 ("Gordon") or to Gordonworks.com, and no email messages were sent to Gordon or
11 Gordonworks.com on my behalf.

12 7. I am neither an officer, director, nor majority shareholder of Impulse
13 Marketing Group, Inc. ("Impulse").

14 8. I am an employee of Impulse. I do not control, authorize or direct
15 Impulse's policies and/or practices.

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

18 DATED this 30 day of August, 2006.

19
20 
21 Kenneth Adamson