

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

KIEL PATRICK JAMES LLC,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No.: 1:17-cv-00650

Judge Sharon Johnson Coleman

Magistrate Judge Michael T. Mason

**DECLARATION OF KEITH A. VOGT**

I, Keith A. Vogt, of Oak Park, Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for 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 Defaulting Defendants (as defined in the accompanying Memorandum) 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. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify the registrant of each associated domain name and its contact information. Our investigation confirmed that the Defaulting Defendants are primarily domiciled in China. As such, I am informed and believe that the Defaulting

Defendants are not active-duty members of the U.S. armed forces.

4. Exhibit A is an accurate copy of unpublished decisions cited in the corresponding Memorandum in Support of Plaintiffs' Motion for Entry of Default and Default Judgment Against the Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 31, 2017

/s/ Keith A. Vogt  
Keith A. Vogt  
*Counsel for Plaintiff*