

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 07-22674-Civ-JORDAN/Torres

DELL INC.; AND ALIENWARE CORPORATION,

Plaintiffs,

vs.

BELGIUMDOMAINS, LLC; CAPITOLDOMAINS,
LLC; DOMAINDOORMAN, LLC; NETRIAN
VENTURES LTD.; IHOLDINGS.COM, INC.;
JUAN PABLO VAZQUEZ a/k/a JP VAZQUEZ, an
individual; and DOES 1 – 10;

Defendants.

**DECLARATION OF DAVID J. STEELE IN SUPPORT OF PLAINTIFFS' MOTION
FOR SANCTIONS, INCLUDING THE ENTRY OF A DEFAULT JUDGMENT**

I, David J. Steele, make the following statements upon my personal knowledge and belief:

1. My name is David Jefferson Steele. I am of legal age and sound mind, and I am competent to make this declaration.

2. I am an attorney with the law firm of Christie, Parker & Hale, LLP, counsel of record for Plaintiffs Dell, Inc. and Alienware Corporation (collectively "Plaintiffs"). The matters set forth below are of my personal knowledge and, if called as a witness, I would testify competently to each of the following facts.

3. I participated in the seizure at the residence of one of the Defendants, Mr. JP Vazquez at 11605 South West 99th Court, Miami, Florida on November 9, 2007. During this seizure, I confirmed that Defendants maintain servers, used in their business, at a facility in Miami operated by Internap Network Services Corporation. I advised Mr. Vazquez that Plaintiffs would coordinate the forensic copying of these servers the following week.

4. On November 12, 2007, Plaintiffs' attorney, Mimi Sall, contacted Richard Barron, attorney for Mr. Vazquez, to arrange for inspection of these servers by the Court-approved Forensic Expert. Attached as Exhibit A is an email documenting this correspondence.

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

Executed on the 4th day of January, 2008.



David J. Steele

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Mimi L. Sall _____

Dell Inc. and Alienware Corporation vs. Belgiumdomain, LLC, et al.
Case No. 07-22674-Civ-JORDAN/Torres
United States District Court, Southern District of Florida

<p>Lawrence P. Rochefort, Esquire E-mail: lawrence.rochefort@akerman.com Christopher S. Carver, Esquire E-mail: christopher.carver@akerman.com AKERMAN SENTERFITT SunTrust International Center Suite 2500 One S.E. Third Avenue Miami, Florida 33131 Tel.: 305-374-5600 Fax: 305-374-5095 Attorneys for BelgiumDomains, LLC, CapitolDomains, LLC, DomainDoorman, LLC, Netrian Ventures, Ltd., and iHoldings.com, Inc. Service by CM/ECF</p> <p>Joel R. Dichter, Esquire E-mail: jdichter@NewmanDichter.com Derek Newman, Esquire E-mail: derek@NewmanDichter.com Newman Dichter 505 Fifth Avenue South, Suite 610 Seattle, WA 98104 Tel.: 206-274-2800 Fax: 206-274-2801 (Moving for Admission Pro Hac Vice) Service by CM/ECF</p>	<p>Richard Baron, Esquire Email: rbaron@bellsouth.net Richard Baron & Associates 501 NE 1st Avenue Suite 201 Miami, FL 33132 Tel. 305-577-4626 Fax: 305-577-4630 Attorneys for Defendant Juan Pablo Vazquez Service by CM/ECF</p>
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