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 10 United States District Court for the
 11 Northern District of California

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 14 ANITA M. FLYNN,

15 Plaintiff,

16 vs.

17 AK PETERS, LTD,

18 Defendants.

No. C-98 04581 CW

19 **DECLARATION OF BRUCE**
 20 **SEIGER IN SUPPORT OF A K**
 21 **PETERS' REPLY**
 22 **MEMORANDUM IN SUPPORT**
 23 **OF ITS MOTION TO TRANSFER**
 24 **VENUE**

25 Date: May 14, 1999
 26 Time: 10:00 a.m.
 27 Place: Courtroom 2
 28 Hon. Claudia Wilken

22 I, Bruce Seiger, declare under the penalty of perjury under the laws of the
 23 United States and the Commonwealth of Massachusetts that the following is true and correct
 24 of my own personal knowledge. If called upon to testify as to the matters set forth herein, I
 25 could and would do so competently. I submit this declaration in support of defendant A K
 26 Peters' reply in support of its motion to transfer venue to the District of Massachusetts. This

1 declaration is limited to that specific purpose, and does not purport to contain all of my
2 relevant knowledge regarding this case.

3 1. My current address is 4 Peters Road in Newburyport, Massachusetts,
4 01950.

5 2. I am employed on a full-time basis as a high school physics instructor at
6 Wellesley High School, in Wellesley, Massachusetts. I must be at work from 7:15 am to
7 3:00 pm each weekday.

8 3. I am one of the co-authors of the Second Edition of *Mobile Robots:
9 Inspiration to Implementation*.

10 4. I understand that my co-author Anita M. Flynn has filed this lawsuit
11 against the publisher of the Second Edition of *Mobile Robots*, A K Peters, Ltd. in California.

12 5. I am not currently employed by A K Peters, Ltd., nor have I ever been
13 employed by them in any capacity. Any and all reference to the title of "Systems
14 Administrator" for A K Peters that may appear on any electronic mail correspondence from
15 me, is a joke that refers to one occasion when I answered an A K Peters' employee's
16 question regarding the use of some computer software. I am not currently employed nor
17 have I ever been employed as a Systems Administrator for A K Peters.

18 6. I also understand that I will be called upon to testify at the trial in this
19 litigation, which I have been informed is scheduled to commence in Oakland, California on
20 December 20, 1999.

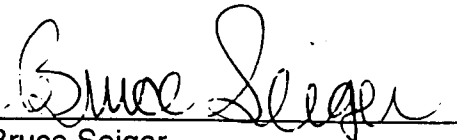
21 7. I live in Newburyport, Massachusetts, and work in Wellesley,
22 Massachusetts.

23 8. Typically, in and around December 20, 1999, I am in the process of
24 administering final exams to my students and completing report cards. For each of these
25 reasons, it would be a great hardship for me to to travel to California, to spend approximately
26 one week to prepare for and testify at the trial of this matter.

27 9. If the trial were to take place closer to where I live and work, it would be
28 much easier to make myself available to testify, if necessary.

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Executed this 28th day of April 1999, at Wellesley High School, 50 Rice St.,
Wellesley, MA 02481-6007


Bruce Seiger