

1 **DECLARATION OF CLEMENCE BECTARTE IN SUPPORT OF**
2 **DEFENDANT’S MOTION TO DISMISS UNDER RULE 12(b)**
3 **FOR LACK OF JURISDICTION, INSUFFICIENT SERVICE OF**
4 **PROCESS, AND FAILURE TO STATE A CLAIM**
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7 I, Clémence Bectarte, declare as follows:

8 1. I am the Coordinator of the Legal Action Group of Defendant
9 FEDERATION INTERNATIONALE DES DROITS DE L'HOMME (“FIDH”). I
10 make this declaration in support of Defendant’s Motion to Dismiss under Rule 12(B)
11 for Lack Of Jurisdiction, Insufficient Service of Process, and Failure to State a Claim
12 in the matter of *Orian et al. v. FIDH et al.*, United States District Court, Central
13 District of California, Case No. CV 11-6904. The following facts are true of my own
14 personal knowledge, except for those matters stated on information and belief, which
15 matters I believe to be true. If called to testify, I could and would competently attest
16 to the matters stated herein.

17 2. I have been working at FIDH since 2007. In my current position as
18 Coordinator of FIDH’s Legal Action Group, I supervise all FIDH’s litigation
19 activities under the authority of FIDH’s Chief Executive Officer and of FIDH’s
20 former president, Patrick Baudouin.

21 3. Attached hereto as Exhibit A is a true and correct copy of the envelope
22 received by FIDH on August 31, 2011, from Global Horizons Inc. and Mordechai
23 Orian.

24 4. Attached hereto as Exhibit B is a true and correct copy of the envelope
25 received by FIDH on September 2, 2011, from Global Horizons Inc. and Randolph
26 Shiner.

27 5. To my knowledge, FIDH has not received anything from the Clerk of the
28 Court in the above-mentioned matter.

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

Executed on October 17, 2011.



Clemence BECTARTE

Name of Declarant

