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DECL

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*Attorneys for Specially Appearing Defendants,
David Reichman, Kathy M. Griffin, Frank Benintendo,
Donald Gilbert, and Global Tech Industries Group, Inc.*

**EIGHT JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

WHITE ROCKS (BVI) HOLDINGS INC., et al.)	Case No. A-24-896359-B
)	Dept. No. 16
Plaintiffs,)	
)	
vs.)	DECLARATION OF KATHY GRIFFIN
)	IN SUPPORT OF DEFENDANTS'
DAVID REICHMAN, KATHY M. GRIFFIN,)	MOTION TO DISMISS
FRANK BENINTENDO, DONALD)	
GILBERT, DOES I THROUGH X,)	
INCLUSIVE, and ROE CORPORATIONS I)	
THROUGH X, inclusive,)	
)	
Defendants,)	
)	
)	
)	

DECLARATION OF KATHY GRFFIN

I, Kathy Griffin, declare as follows:

1. I am the President of Global Tech Industries Group, Inc. ("GTII"), and a member of the Board of Directors. I have been individually named as a Defendant in this action. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

2. I am a resident of Massachusetts.

3. I personally have no business dealings, contacts, or ties to Nevada.

4. GTII's principal place of business at all times has been located in New York, New York.

5. GTII does not maintain any offices, or conduct any business in Nevada.

6. GTII does not have any employees in Nevada.

7. GTII does not own or maintain any property in Nevada.

8. For at least the last five (5) years, all GTII board meetings have been conducted virtually.

9. All GTII in person meetings have taken place in New York, New York.

10. All GTII company books, records, and documents are located in New York or Massachusetts, where I reside.

11. Based on my review of the shareholder lists currently available to me, it does not appear that any of the Plaintiff shareholders are residents of Nevada.

12. If this matter is litigated in Nevada, it will cause a great burden on myself, my family, and GTII. This burden would create such grave difficulty and inconvenience that it would place me at a severe disadvantage in this litigation.

13. I am currently 70 years old. Due to my age and current health condition, defending this litigation in Nevada will be harassing, oppressive, vexatious, and inconvenient.

14. I am amenable to litigating this matter in New York.

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1 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true
2 and correct. Executed on this 9/14/2024, at Hingham, MA, 2:06 am
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5 DocuSigned by:
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7 8C98C24142B146D...
8 Kathy Griffin
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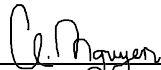
CERTIFICATE OF SERVICE

Pursuant to Nev.R.Civ.P. 5(b), I hereby certify that on September 16, 2024, I served a true and correct copy of the foregoing:

DECLARATION OF KATHY GRIFFIN IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

electronically via the court's e-filing system Odyssey eFileNV, including the following interested parties named below:

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