

1 **DECL**

2 ROBERT A. RABBAT (Nevada Bar #12633)

3 TERI T. PHAM (CA Bar #193383 – *Pro Hac Vice*)

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7 *Attorneys for Defendants,*

8 *David Reichman, Kathy M. Griffin, Frank Benintendo,*

9 *Donald Gilbert, and Global Tech Industries Group, Inc.*

10 **EIGHT JUDICIAL DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12  
13 WHITE ROCKS (BVI) HOLDINGS INC., et al.

14 Plaintiffs,

15 vs.

16 DAVID REICHMAN, KATHY M. GRIFFIN,  
17 FRANK BENINTENDO, DONALD  
18 GILBERT, DOES I THROUGH X,  
19 INCLUSIVE, and ROE CORPORATIONS I  
20 THROUGH X, inclusive,

21 Defendants,

) Case No. A-24-896359-B

) Dept. No. 13

) **DECLARATION OF DONALD**

) **GILBERT IN SUPPORT OF**

) **DEFENDANTS' MOTION TO DISMISS**

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1. I am a member of Global Tech Industries Group, Inc.'s ("GTIG") 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.

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

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

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8. All GTII company records and documents are located in New York or Massachusetts,

8. All GTII company records and documents are located in New York or Massachusetts, where GTII's president resides.

9. 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.

and GTII. This burden would create such grave difficulty and inconvenience that it would place me at a severe disadvantage in this litigation.

10. I am currently 88 years old. Due to my age and current health conditions, including recently undergoing both hip surgery and eye surgery, defending this litigation in Nevada will be harassing, oppressive, vexatious, and inconvenient.


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

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed on this Sept. 11, 2024, at Staten Island, New York.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed on this Sept. 11, 2024, at Staten Island, New York.

and correct. Executed on this Sept. 11, 2024, at Staten Island, New York.

  
Donald Gilbert

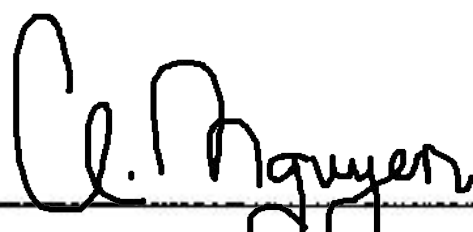
**CERTIFICATE OF SERVICE**

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 DONALD GILBERT 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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\_\_\_\_\_  
Celeste Nguyen