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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. 13
Plaintiffs,)	
)	DECLARATION OF DAVID
vs.)	REICHMAN IN SUPPORT OF
)	DEFENDANTS' MOTION TO DISMISS
DAVID REICHMAN, KATHY M. GRIFFIN,)	
FRANK BENINTENDO, DONALD)	
GILBERT, DOES I THROUGH X,)	
INCLUSIVE, and ROE CORPORATIONS I)	
THROUGH X, inclusive,)	
)	
Defendants,)	
)	
)	
)	

DECLARATION OF DAVID REICHMAN

I, David Reichman, declare as follows:

1. I am the former CEO 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 New York, New York.

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, except one.

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

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.

10. I am currently 80 years old. Due to my age and current medicine routines, defending this litigation in Nevada will be harassing, oppressive, vexatious, and inconvenient.

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 9/13/2024, at Los Angeles, CA.

DocuSigned by:

 DA5F0A19436462...
 David Reichman

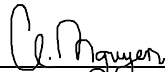
CERTIFICATE OF SERVICE

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 DAVID REICHMAN 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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