

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

FISHER-PRICE, INC. and  
MATTEL, INC.,

Plaintiffs,

vs.

DYNACRAFT BSC, INC.,

Defendant.

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C.A. No. 17-0051-LPS-CJB

**Declaration of David Castrucci in Support of Defendant  
Dynacraft BSC, Inc.'s Motion to Dismiss for Improper Venue**

I, David Castrucci, am the Managing Director at Dynacraft BSC, Inc. ("Dynacraft") and I have personal knowledge of the facts attested to herein. I declare under penalty of perjury that the content of this declaration is true and correct.

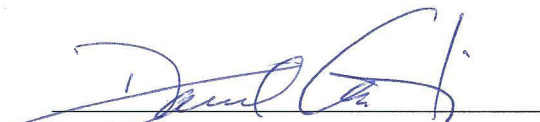
1. Dynacraft is a corporation organized and existing under the laws of the State of Massachusetts but has no regular and established business there. Dynacraft has no employees and does not have any physical facilities in Massachusetts.

2. Dynacraft is headquartered at 89 S. Kelly Road, American Canyon, California. Dynacraft employs about 40 employees at its headquarters, including its corporate officers and product design staff. At its headquarters, Dynacraft's operations include management, personnel, customer service, shipping, traffic, IT, and creative.

3. Dynacraft is not incorporated in the State of Delaware.

4. Dynacraft does not have any regular and established business in the District of Delaware. Dynacraft has no employees and does not have any physical facilities in Delaware.

Dated: June 1, 2017

  
David Castrucci