

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	x	
	:	
BROADSIGN INTERNATIONAL, LLC,	:	
	:	
	:	Civil Action No.: 1:16-cv-04586 (LTS)
Plaintiff,	:	
	:	
v.	:	JURY TRIAL REQUESTED
	:	
T-REX PROPERTY AB,	:	
	:	
	:	
Defendant.	:	
_____	x	

**DECLARATION OF ALFRED R. FABRICANT IN SUPPORT
OF PLAINTIFF’S MOTION FOR LEAVE TO AMEND
THE COMPLAINT PURSUANT TO FED. R. CIV. P. RULE 15**

I, Alfred R. Fabricant, being duly sworn, hereby declare as follows:

1. I am a member of Brown Rudnick, LLP, counsel of record for Plaintiff BroadSign International, LLC (“BroadSign”). I am a member of the Bar of the State of New York and have been admitted to practice in the United States District Court for the Southern District of New York. I make this declaration in support of Plaintiff BroadSign’s motion for leave to further amend the complaint. The statements in this declaration are based upon my review of information obtained from public records.

2. Attached hereto as Exhibit 1 is a proposed Second Amended Complaint and Exhibit A to the Second Amended Complaint in compliance with the Court’s Order. Dkt 40 at

10.

3. Attached hereto as Exhibit 2 is a blacklined version of the proposed Second Amended Complaint in compliance with the Court's Order. Dkt 40 at 10.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on January 31, 2018.

/s/ Alfred R. Fabricant
Alfred R. Fabricant (AF8255)