

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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	:	
KALMAN ROSENFELD, individually and	:	
on behalf of all others similarly situated,	:	No.: 1:20-cv-04662-RRM-PK
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
AC2T, INC., BONNER ANALYTICAL	:	
TESTING CO., and JEREMY HIRSCH.	:	
	:	
Defendants.	:	
-----X		

**DECLARATION OF DEFENDANT JEREMY HIRSCH IN SUPPORT OF
MOTION TO DISMISS COMPLAINT**

Pursuant to 28 U.S.C. § 1746, Jeremy Hirsch hereby declares as follows:

1. I am a resident of Forrest County, Mississippi. I have been a resident of Mississippi since 1988, excluding college, military service, and military-related consulting work. I moved back to Mississippi permanently in 2010.
2. I do not reside in New York or own property in New York. I do not hold any bank or other financial accounts in New York. I do not conduct personal business in New York.
3. I do not regularly travel to New York, although I have boarded connecting flights at New York airports while traveling to other locations. Other than flight connections, the last time I traveled to New York was in the summer of 2005: My sister and I visited Plattsburgh, New York for two days while I was home from assignment in Guantanamo Bay.
4. I am Chair of the board of directors for AC2T, Inc (the “Company”). I do not hold any other officer position at the Company.

5. I resigned as President of the Company on or about November 7, 2019. Anthony Brett Conerly has served as the Company's President ever since.

6. The Company does not have a New York-specific marketing plan or strategy, and I certainly do not direct any such plan or strategy for the Company.

Pursuant to Title 28, United States Code, Section 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

Executed: January 4, 2021
Purvis, Mississippi



JEREMY HIRSCH