

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

Civil No. 3:13-cv-00297 (JAM)

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BRUCE KIRBY, INC. AND BRUCE KIRBY, :
      Plaintiffs                    :
      :                               :
VS                                     :
      :                               :
LASERPERFORMANCE (EUROPE) LIMITED, :
QUARTER MOON, INCORPORATED,        :
KARAYA (JERSEY) LIMITED, VELUM    :
LIMITED ITM SA (ANTIGUA AND       :
BARBUDA), INTERNATIONAL SAILING   :
FEDERATION LIMITED,               :
INTERNATIONAL LASER CLASS         :
ASSOCIATION, AND FARZAD RASTEGAR, :
      Defendants                    :
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Deposition of BRUCE KIRBY taken at the offices of St. Onge Steward Johnston & Reens, LLC, 986 Bedford Street, Stamford, Connecticut 06905-5619, before Clifford Edwards, LSR, Connecticut License No. SHR.407, a Professional Shorthand Reporter and Notary Public, in and for the State of Connecticut on June 13, 2014, at 10:53 a.m.

DEL VECCHIO REPORTING SERVICES, LLC
PROFESSIONAL SHORTHAND REPORTERS
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MADISON, CT 06443

HARTFORD

NEW HAVEN

STAMFORD

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ALSO PRESENT:

WILLIAM S. CRANE, LASERPERFORMANCE
BAHMAN KIA, LASERPERFORMANCE

1 and Bruce Kirby, Inc.

2 A Uh-huh.

3 Q Is that right?

4 A I sometimes use Bruce Kirby Marine Design
5 on my letterhead.

6 It's not an official -- Bruce Kirby,
7 Inc. is my corporation.

8 Q Okay. So Bruce Kirby Marine Design is
9 just a -- is just a trade name for you?

10 A Yeah.

11 Q Okay. So do you have any other entities,
12 other than Bruce Kirby, Inc.?

13 Do you own any other entities?

14 A No.

15 Q Does Bruce Kirby have any employees?

16 A My wife does the books.

17 Apart from that, it's just me.

18 Q Does it have any revenue?

19 A Yeah.

20 It -- I have the boats we mentioned
21 earlier that are still being built that I get
22 royalties from.

23 Q So what boats do you currently get
24 royalties from?

25 A Well, the Sonar and the Ideal 18, Pixel
www.DelVecchioReporting.com

1 and -- I thought we named four before.

2 I have another design called a Norwalk
3 Island Sharpie. It's a little cruising boat. Old
4 fashioned sort of thing.

5 And those are being sold out of
6 Australia. And I do get a royalty check from the
7 Australians on that boat.

8 Q That's Performance Sailcraft Australia?

9 A Oh, no. No.

10 Different -- this fellow is down in
11 Adelaide. A fellow named Robert Ayliffe who runs
12 the Norwalk -- the Norwalk Island Sharpie business.

13 And sorry. I shouldn't be going on like
14 this. But I did a 38-foot custom one off for a
15 fellow about five years ago. So, you know, I may --
16 I may get the, you know, custom stuff.

17 Q Okay. Does your wife do any work for
18 Bruce Kirby, Inc., other than bookkeeping?

19 A No.

20 Q And is she the person who keeps track of
21 the royalties due from entities that sell boats you
22 designed?

23 A Yes, she does.

24 Q Other than your counsel here, is there
25 anyone else or any other entity that does work for
www.DelVecchioReporting.com

1 Bruce Kirby, Inc. and -- and your wife that you
2 mentioned?

3 A I have a CAD draftsman who works for me
4 from time to time.

5 I don't do CAD myself.

6 Q Okay. All right. Is there something
7 called the "construction manual" for the Laser?

8 A Yes.

9 Q What is it?

10 A Well, it's a very thick book that lays
11 out exactly how the boat is to be built, put
12 together, and so on. Very detailed.

13 Q Who owns that?

14 MR. COREA: Objection to form, just
15 as to the legal question of ownership.

16 But please answer.

17 BY MR. ALLENTUCH:

18 Q Do you understand the question?

19 A Yeah. I think so.

20 Q Okay.

21 THE WITNESS: What am I doing here,
22 Andrew?

23 MR. COREA: You -- you can answer
24 the question.

25 I -- I've -- as -- as we, you know,
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