

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :
:
Plaintiffs, :

-against-

07 Civ. 9399 (CSH)
ECF Case

VINOD KUMAR, VIRENDER YADAV, :
SUKHWINDER SINGH AND :
DART AIR, INC. ALL D/B/A :
MODERN BOOKS D/B/A EXPRESS BOOKS :
D/B/A UNIQUE BOOKS D/B/A :
JHON BOOK STORE D/B/A :
EXPRESSBOOKS06 D/B/A :
QUALITYINSTRUMENTS400 :
AND JOHN DOES NOS. 1-5, :
:
Defendants. :

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DECLARATION OF WILLIAM SAMPSON IN SUPPORT
OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

WILLIAM SAMPSON hereby declares pursuant to 28
U.S.C. § 1746 that the following is true and correct:

1. I am Manager, Infringement & Anti-Piracy
of plaintiff Cengage Learning Inc. ("Cengage"), formerly
Thomson Learning Inc. I am making this declaration in
support of plaintiffs' motion for summary judgment on their
copyright claims against defendants Vinod Kumar a/k/a Vinod
Nautiyal and Dart Air, Inc.

2. My responsibilities at Cengage involve the enforcement of its copyrights, including its copyrights in higher education textbooks.

3. Annexed as Exhibit C are copies of Cengage's Certificate of United States Copyright Registration for the following works:

Title

Date of Registration

Registration Number

1. Advanced Engineering
Math
August 22, 2002
TX0005625435
2. Organization Theory
and Design
September 29, 2006
TX0006443003
3. Organizational Behavior
October 2, 2006
TX0006433256
4. Principles of Instrumental
Analysis
January 16, 2007
TX0006499740
5. Psychopathology: A Competency-Based
Assessment Model for Social Workers
December 14, 2000
TX0005196411
6. Biology: Concepts and Applications
February 8, 1991
TX0002997814
7. Animal Physiology
September 30, 2004
TX0006037766

8. Human Resource Development
January 12, 2006
TX0006303352
9. Cognitive Psychology
October 22, 2002
TX0005665400
10. Engineering Ethics:
Concepts and Cases
January 19, 2000
TX0005056029
11. Principles of
Microeconomics
September 29, 2006
TX0006437003
12. Brief Principles of Macroeconomics
September 29, 2006
TX0006437004
13. Mechanics of Materials
January 9, 2004
TX0005903143
14. Principles of Economics
September 29, 2006
TX0006434553
15. Management of Electronic Media
December 6, 2001
TX0005633122
16. Fundamentals of Financial
Management
March 15, 2006
TX0006328846
17. Operations Research:
Applications and Algorithms
March 4, 1994
TX0003790957

18. Global Strategy
January 3, 2006
TX0006305724
19. Human Physiology: From
Cells to Systems
June 19, 2003
TX0005673286
20. Numerical Analysis
March 6, 2001
TXu000998584
21. Calculus: Early
Transcendentals
July 16, 1999
TX0004241945
22. Group Dynamics
December 2, 1998
TX0004899497
23. Theories of Personality
September 22, 2000
TX0005277566
24. Classical Dynamics of
Particles and Systems
July 30, 2003
TX0005827168
25. Food and Culture
August 22, 2003
TX0005827380
26. Biochemistry
November 25, 2002
TX0005700280
27. Principles of Heat
Transfer
October 19, 2000
TX0005292081

28. Developmental Psychology:
Childhood and Adolescence
September 3, 1998
TX0004844200
29. Managerial Economics:
A Problem Solving Approach
March 19, 2007
TX0006547795
30. Analytical Mechanics
April 6, 2004
TX0005948682
31. Accounting Information
Systems
March 1, 2004
TX0005900590
32. Applied Regression Analysis
for Business and Economics
August 14, 2000
TX0005257126
33. Introduction to Probability
and Statistics
March 9, 2005
TX0006116659
34. Analog and Digital Signal
Processing
March 5, 1999
TX0004942689
35. Business Research Methods
February 7, 2005
TX0006116887
36. Statistics for Management
and Economics
January 12, 2005
TX0006110369
37. Technical Communication:
A Reader-Centered Approach
December 19, 2006
TX0006496094

38. Fundamentals of Logic Design
July 7, 2003
TX0005804154
39. Invertebrate Zoology
August 28, 2003
TX0005818299
40. Financial Markets and
Institutions
December 5, 2006
TX0006485236
41. Consumer Behavior
March 14, 2006
TX0006340608
42. Statistics for Business
and Economics
January 3, 2006
TX0006352862
43. Psychology Applied to
Modern Life: Adjustment
in the 21st Century
July 12, 2005
TX0006196883
44. Essentials of Management
February 25, 1994
TX0003749501
45. Vibrations
June 26, 2003
TX0005782689
46. Probability:
The Science of Uncertainty
March 19, 2001
TXu000995888
47. Principles of Geotechnical
Engineering
December 7, 2001
TX0005661123

48. Abnormal Psychology
October 7, 2004
TX0006051728
49. Solid Waste Engineering
December 6, 2001
TX0005558657
50. Fundamentals of Analytical
Chemistry
August 28, 2003
TX0005800626
51. Psychological Testing Principles,
Applications, and Issues
August 29, 2000
TX0005267396
52. Employee Selection
October 22, 2002
TX0005660599
53. Principles of Biostatistics
May 8, 2000
TX0005206416
54. Introduction to Microbiology:
A Case-Study Approach
May 1, 2003
TX0005735278

4. On or about August 31, 2007, Thomson Learning Inc. ("Thomson") changed its corporate name to Cengage Learning Inc. All rights, title and interest in the intellectual property described herein have remained with the same company; only the company's name has changed.


5. Although the copyright claimant for these works is an entity or name other than Cengage, each is a predecessor or fictitious name of Cengage.

- Brooks/Cole Publishing Co. is a fictitious name under which Cengage does business.
- Wadsworth, Inc. is a corporate predecessor of Cengage.
- Wadsworth Publishing Co., Inc. is a corporate predecessor of Cengage.
- South Western Publishing Co. is a fictitious name under which Cengage does business.
- Harcourt, Inc. is the prior owner that transferred ownership by Assignment of Copyright to Thomson Learning Inc., now known as Cengage Learning, Inc., in 2001.

6. Cengage's Foreign Editions of United States books are identical in content to books copyrighted in the United States, except for the quality of the printing, but published outside of the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of June 2008.



William Sampson