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6 Specially Appearing for Defendant
CHARLES D. FLYNN.

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 NORMEXSTEEL, INC., a Florida
12 corporation; DOUGLAS B. PAYNE, an
13 individual; and JOANN L. HUNTER, an
individual,

14 Plaintiffs,

15 v.

16 CHARLES D. FLYNN, as an individual,
as trustee of THE TAURUS TRUST, and
17 as officer and director of BAIERVERDE
INVESTMENT CORP., THE TAURUS
18 TRUST, a Hamilton, Bermuda trust, and
the BAIERVERDE INVESTMENT CORP.,
19 a Swiss corporation,,

20 Defendants.
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Case No. 06 CV 0814-BTM (NLS)

**DECLARATION OF CHARLES
FLYNN IN SUPPORT OF
DEFENDANT FLYNN'S
PRELIMINARY INJUNCTION
HEARING BRIEF**

DATE: April 25, 2006
TIME: 11:30 a.m.
JUDGE: Hon. Barry T. Moskowitz

25 I, Charles Flynn, hereby declare under penalty of perjury under the laws of
26 the United States that the following facts are true and correct of my own personal
27 knowledge and belief and if called upon to testify could and would swear under oath that:
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