UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS EASTERN DIVISION

DAVID BONIFACE,

NISSANDÈRE MARTYR, and

JUDERS YSEMÉ,

Plaintiffs,

v.

JEAN MOROSE VILIENA (a.k.a. JEAN MOROSE VILLIENA),

Defendant.

Case No. 1:17-cv-10477-ADB

DECLARATION OF BONNIE LAU

- I, Bonnie Lau, declare as follows:
- I am a partner with the law firm of Morrison & Foerster. I am a member in good standing of the Bar of the State of California. I have been admitted *pro hac vice* in the above-captioned matter as counsel of record for plaintiffs David Boniface, Nissandère Martyr, and Juders Ysemé ("Plaintiffs").
- 2. I submit this declaration pursuant to Federal Rule of Civil Procedure 56(c)(4) in support of Plaintiffs' Reply in Support of Their Motion for Partial Summary Judgment. I have personal knowledge of the following facts that would be admissible as evidence and, if called as a witness, I could and would competently testify to them.
- 3. Defendant has not disclosed any expert witnesses pursuant to Federal Rule of Civil Procedure 26(a)(2) and Local Rule 26.4.
- 4. Defendant did not seek to depose Plaintiffs' expert, Brian Concannon, Jr.

5. Per the Court's November 15, 2021 scheduling order, expert discovery in this matter closed on January 31, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on May 2, 2022.

/s/ Bonnie Lau
Bonnie Lau

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, I caused to be filed electronically a true copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will notify the parties of record via electronic notification.

/s/ Bonnie Lau	
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