

**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:

1. 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.

