

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SANG LAN, :

Plaintiff, :

-against- :

AOL TIME WARNER, INC., THE UNITED STATES :
GYMNASTICS FEDERATION d/b/a USA :
GYMNASTICS, TIG INSURANCE COMPANY, TIG :
SPECIALTY INSURANCE SOLUTIONS, :
RIVERSTONE CLAIMS MANAGEMENT, LLC, TED :
TURNER, K.S. LIU, GINA LIU AKA K.S GINA HIU- :
HUNG, WINSTON SIE, HUGH MO, JOHN DOES :
AND JANE DOES # 1 THROUGH 15, INCLUSIVE, :

Defendants. :
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Index No.: 11-CV-2870
(LBS)(JCF)

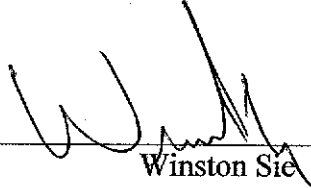
DECLARATION OF WINSTON SIE
IN SUPPORT OF DEFENDANTS' MOTIONS

I, Winston Sie, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am Winston Sie, a Defendant in the above-captioned matter, also incorrectly sued herein as "Wilson Xue," and am fully familiar with the matters set forth herein.
2. I make this Declaration for the purpose of supporting my attorneys' two Motions to Dismiss and Motion for Sanctions, and to contest Plaintiff's false allegations that I am a U.S. citizen and domiciliary of New York State, which cannot be further from the truth.

3. I am a citizen of Hong Kong SAR (Special Administrative Region, China), where I have worked and resided since February 2002.
4. I was born in Hong Kong and became a citizen of the United States by naturalization on or about April 6, 1995, and resided in the United States from July 1989 to February 2002.
5. In or about February 2002, I moved to Hong Kong, where I acquired my nationality of Hong Kong SAR by virtue of my birth.
6. In July 2008, I formally renounced my U.S. nationality at the U.S. Consulate General, Hong Kong.
7. Additionally, I am not a permanent resident of the United States, do not maintain a residence in the United States, do not own any real estate in New York, and do not have any plans to return to reside in the United States.
8. Moreover, I have not been served by Plaintiff with any papers in this Action to date.
9. Therefore, I also hereby object to the personal jurisdiction of this Court for this Action.
10. Furthermore, as I have been informed by my attorneys that Plaintiff has made spurious allegations against me in this Action, I am constrained to state that said allegations are also false and without any basis in fact.

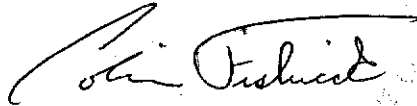
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 17, 2011


Winston Sie

Consulate General of the
United States of America } SS:
at Hong Kong

C

Subscribed and sworn to before me
this 21st day of June 2011.



Colin W. Fishwick
Vice Consul

