

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

RUGGED CROSS HUNTING BLINDS, LLC,

Plaintiff,

vs.

FERADYNE OUTDOORS, LLC, A Delaware
Corporation, and DBR FINANCE, INC., f/k/a
OUTDOOR PRODUCT INNOVATIONS, INC., an Ohio
corporation.

Defendants.

Case No. 3:22-cv-00690

Hon. James D. Peterson

**DECLARATION OF DAN REASER IN SUPPORT OF DEFENDANT DBR FINANCE
INC.'S MOTION TO DISMISS FOR IMPROPER VENUE**

I, Dan Reaser, declare:

1. I am the CEO for DBR Finance, Inc. (“DBR”) f/k/a Outdoor Product Innovations, Inc. (“OPI”). I make this declaration based on my personal firsthand knowledge and, if called upon as a witness, I would testify completely thereto.
2. I make this declaration in support of DBR’s Motion to Dismiss For Improper Venue.
3. DBR is a domestic corporation incorporated in the State of Ohio with its principal place of business at 117 Reaser, Ct., Elyria, Ohio 44035.
4. DBR was formerly known as OPI, which was a multi-brand hunting and outdoor company. Defendant FeraDyne Outdoors, LLC acquired substantially all assets of OPI. While DBR continues to exist, it is not currently operating in the hunting and outdoor industry.
5. DBR does not have business operations in the Western District of Wisconsin, contrary to the allegations in Paragraph 10 of the Second Amended Complaint. The inventory sold to FeraDyne was in Ohio. Transitions services rendered to FeraDyne were temporary and all transition services were provided in Ohio.
6. DBR does not own, lease, rent, maintain, or operate any facilities in the Western District of Wisconsin, and DBR has not ever owned, leased, rented, maintained, or operated any facilities in the Western District of Wisconsin.
7. DBR does not have, and has not ever had, any employees that work or live in the Western District of Wisconsin.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 16th, 2023

/s/ [Signature]
Dan Reaser