Darren W. Saunders (<u>dsaunders@wkbllp.com</u>) WILSON KEADJIAN BROWNDORF LLP 114 West 47th Street New York, NY 10036 Tel: (646) 783-3654

Attorneys for Defendants/Counterclaim Plaintiffs

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AQUAZZURA ITALIA SRL,

Plaintiff,

v.

IVANKA TRUMP, IT COLLECTION LLC, MARC FISHER HOLDINGS LLC,

Defendants.

Civil Action No. 1:16-cv-04782-KBF

IT COLLECTION LLC and MARC FISHER HOLDINGS LLC,

Counterclaim Plaintiffs,

v.

AQUAZZURA ITALIA SRL,

Counterclaim Defendant.

DECLARATION OF IVANKA TRUMP

IVANKA TRUMP declares and says:

- 1. I am a defendant in this action and the former President of
 Defendant/Counterclaim Plaintiff IT Collection LLC (the "Company"). I am presently Assistant
 to the President of the United States. I currently reside in Washington, District of Columbia and
 maintain an office in the White House.
- 2. It has come to my attention that Plaintiff/Counterclaim Defendant Aquazzura Italia SRL ("Aquazzura") commenced this lawsuit alleging trade dress and patent claims with respect to Aquazzura's "Wild Thing Shoe" and the "Hettie Shoe" which was previously sold under the IVANKA TRUMP brand name by Defendant/Counterclaim Plaintiff Marc Fisher Holdings LLC ("Marc Fisher").
- 3. I had no involvement in the conception, design, production or sale of the "Hettie Shoe." Instead, such responsibilities belonged to the Company's licensee, Marc Fisher.
- 4. My involvement was strictly limited to the final sign-off of each season's line after it was first reviewed and approved by the Company's design team.
- 5. Although I am familiar with Aquazzura generally as a fashion brand, I was not aware of the Aquazzura "Wild Thing Shoe" at the time I approved the "Hettie Shoe" as part of that season's line.
- 6. I have no personal knowledge whatsoever regarding any other facts at issue in this lawsuit.

Case 1:16-cv-04782-KBF Document 84-1 Filed 06/16/17 Page 3 of 3

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16⁴day of June, 2017 Washington, District of Columbia

2