

1 Stanislav Arbit
2 5344 E Diamond Ave
3 Mesa, AZ 85206
4 Phone: 480-818-4418
5 Email: stan@securepower.io
6 Plaintiff

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF ARIZONA
10 PHOENIX DIVISION
11

12
13 **Stanislav Arbit**) CASE NO.:CV23-00533-PHX-SPL
14 Plaintiff,)
15) DECLARATION OF STANISLAV ARBIT IN
16 vs.) RESPONSE TO OPPOSE DEFENDANT’S
17 **Schneider Electric SE, a**) MOTION TO DISMISS COMPLAINT
18 foreign entity,)
19) Judge Steven P. Logan
20 Defendant.)
21)
22)

23 I, Stanislav Arbit, declare as follows:

24 1. I am representing myself in case no.: CV23-00533-PHX-SPL. This declaration is
25 submitted in support of Plaintiff’s Response to Oppose Defendant’s Motion to Dismiss
26 Complaint. The following facts are within my knowledge and, if called as a witness herein, I
27 can and will competently testify thereto.
28

1 2. I have a bachelor's degree in mechanical engineering technology from an ABET-
2 accredited program, I've passed the Fundamentals of Engineering exam (Other Disciplines),
3 and I have approximately a decade of experience in the mission-critical I.T. infrastructure
4 industry.

5 3. I worked for a manufacturer's representative of Schneider Electric in the State of
6 Arizona and California and I own a company that sold Schneider Electric products. With
7 more than six years of experience, and approximately 10 MM in attributable sales of
8 Schneider Electric SE products, I have extensive knowledge of their go-to-market strategy
9 and organizational structure and can state with certainty, that the Arizona market was
10 specifically targeted, and Schneider Electric SE executed contracts in the State of Arizona.

11 4. Schneider Electric SE is also known by its other brands (e.g., APC, Square D,
12 Invensys, TAC, etc.) and aliases, but it is one global company.

13 5. Mrs. Clayton, Mr. Paul, and Mr. Sharma are senior officers of Schneider Electric SE
14 in the United States and were given actual notice by email regarding this trademark
15 infringement lawsuit in March of this year. An in-house legal representative was copied into
16 the email chain and provided the address that was used by U.S. Marshals for the service of
17 the summons and the complaint.

18 6. Schneider Electric SE is contracted with various end users in Arizona to provide
19 onsite start-up, preventative maintenance, and emergency repairs by technicians employed by
20 Schneider Electric SE.

21 7. LDP Associates is the manufacturer's representative tasked with targeting the
22 Arizona market. As a former LDP Associates employee I have knowledge of an exclusive
23 contract to represent Schneider Electric SE.

24 8. Schneider Electric SE has employees living in Arizona who are assigned to manage
25 the Phoenix market.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By: Stanislav Arbit
5344 E Diamond Ave
Mesa, AZ 85206
Phone: 480-818-4418
Email: stan@securepower.io