

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Golden Gate Yacht Club

Plaintiff,

v.

Societe Nautique de Geneve

Defendant,

Club Nautico Espanol de Vela,

Intervenor-Defendant.

Index No. 602446/07

**AFFIDAVIT OF
ALAN BLOCK**

STATE OF MICHIGAN)
) ss.
COUNTY OF OAKLAND)

ALAN BLOCK, being duly sworn, deposes and says:

1. I am over 18 years of age and am currently the Senior Editor of Sailing Anarchy, a sailing news and information community found online at www.sailinganarchy.com.

2. I have been a contributing editor at Sailing Anarchy since 2005 and Senior Editor since 2007, focusing frequently on the America's Cup. Prior to becoming Senior Editor, I published freelance assignments for Sailing Anarchy. I also have published articles for Sailing World and Sailing Magazine.

3. Sailing Anarchy is the world's most popular sailing news and information website, receiving, on average, between 800,000 and 900,000 unique visitors per month. This means that between 800,000 and 900,000 different users visit the site every month. In our strongest months, we receive over 1.6 million unique visitors. This is significantly higher than any other sailing news website or publication in terms of audience reached.

4. The public forums are an integral part of Sailing Anarchy. There are approximately 30,000 registered, active forum members, and visits to the Sailing Anarchy forums account for approximately forty percent of our web traffic. Since the inception of Sailing Anarchy in 2000, over two million posts have been made on the forums, in tens of thousands of different topic threads. We also maintain a dedicated America's Cup sub-forum, which -- over the three years of its existence -- has received over 100,000 posts in over 3,900 specific topic threads. The America's Cup sub-forum is one of our most popular, attracting hundreds of posted comments and thousands of unique visitors every week.

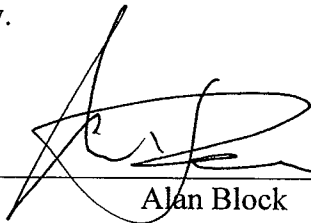
5. I am responsible for Sailing Anarchy's coverage of the America's Cup. Since the current America's Cup controversy began in 2007, we have published over one hundred front-page articles concerning the 33rd America's Cup. This position has placed me in the drivers' seat of understanding the interests of the sailing public, and in particular what those in the worldwide sailing community would like to know about the 33rd America's Cup.

6. Without question, one of the most sought-after pieces of information by the worldwide sailing community is the content of the agreement entered into by Societe Natique de Geneve ("SNG") and the International Sailing Federation ("ISAF"). If the information in that agreement were made public, it would be "top of the front page" news on our website, and would likely be the same in every other sailing publication in the world that covers the America's Cup.

7. The heavy interest in our forums on this topic is indicative of the wider interest. As of August 26, 2009, there were at least eleven threads in the America's Cup forum specifically regarding the SNG/ISAF Agreement (or rather speculation thereabout), with hundreds of comments and thousands of unique views by those who did not comment. For

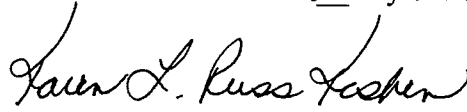
instance, as of August 26, 2009, there were topic threads entitled "Rules: What is still unclear"; "SNG/ISAF Agreement: Will they release it?"; "Back to Court about the ISAF Agreement," and others. Further, speculation about the SNG/ISAF Agreement (and the rules that will govern the match) pervades the other America's Cup topic threads.

8. Given the high level of interest expressed by the readership of Sailing Anarchy and the wider sailing community in the contents of the SNG/ISAF Agreement, it is my belief that the release of that agreement would be in accordance with the vast (if not almost unanimous) desire of the entire worldwide sailing community.



Alan Block

Sworn to before me this 26th day of August, 2009



Notary Public

Karen L. Russ Koshen
Acting in and For the County of Oakland, MI.

Karen L. Koshen
Notary Public, Oakland, County, Michigan
My commission expires: 10-07-12