

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 HALSEY C.
HERRESHOFF**

STATE OF RHODE ISLAND)
) ss.
COUNTY OF BRISTOL)

HALSEY C. HERRESHOFF, being duly sworn, deposes and says:

1. I am over 18 years of age and have served as president of the Herreshoff Marine Museum and America's Cup Hall of Fame for the past 30 years. I graduated from the Webb Institute of Naval Architecture in Glen Cove, New York in 1955. After serving four years as a lieutenant in the United States Navy, I received a master's degree in Marine Engineering from the Massachusetts Institute of Technology ("MIT") in 1960. Subsequently, I joined the faculty of MIT as an instructor, from 1963 to 1968, where I was in charge of research in ship model testing.

2. From about 1961 to 1975, I served as an official yacht measurer for the Cruising Club of America, a national yachting organization founded in 1921, as well as the Narragansett Bay Yachting Association. I estimate that I officially measured over one hundred yachts during

that time, which included measuring for length on load waterline. Consistent with universal practice, I at no time included the rudder in that measurement.

3. Beginning in 1961, I designed yachts for Herreshoff Designs, the longest continuous yacht design service in the United States. I prepared many original yacht designs, which form the basis for construction of over ten-thousand boats. On none of those boats was any portion of the rudder included in the length on load waterline measurement.

4. My family has a long and distinguished history in yachting and the America's Cup. My grandfather, Nathanael G. Herreshoff, began building boats in 1860, and designed the yachts that defended the America's Cup six consecutive times between 1893 and 1920. The Herreshoff Marine Museum houses the design and engineering collection of my family's yachts, and MIT maintains over 17,000 historical design documents. I am familiar with those collections.

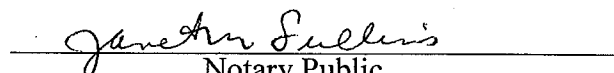
5. In 1876, my grandfather designed a boat named the *Amaryllis*, which is believed to be the first multihull designed in the United States. In fact, my grandfather held a United States patent on multihulls dated April, 1877. The *Amaryllis II*, a precise replica of that catamaran built in 1933, is housed today in the Herreshoff Marine Museum. Since its inception, the published length on load waterline measurement of the *Amaryllis II* has been calculated exclusive of the rudder.

6. I also have extensive America's Cup experience, having been a bowman and navigator for four America's Cup matches between 1958 and 1983, and was intimately involved in the design modification of some of the defending yachts. None of these yachts, and no boat in any America's Cup competition of which I am aware, included the rudder in measurement of the length on load waterline.

7. The uniform custom and practice since the inception of the America's Cup, and continuing through today, has been to exclude any portion of the rudder from the measurement of the length on load waterline.


Halsey C. Herreshoff

Sworn to before me this 31st day of August, 2009


Notary Public
JANET M. SULLINS
Notary Public, State of New York
No. 01SU6192271
Qualified in Jefferson County
Commission Expires August 25, 20 12