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

GOLDEN GATE YACHT CLUB, Plaintiff, v. SOCIÉTÉ NAUTIQUE DE GENÈVE, Defendant, v. CLUB NÁUTICO ESPAÑOL DE VELA, Intervenor-Defendant.	Index No. 602446/07 IAS Part 54 Hon. Shirley Werner Kornreich **AFFIDAVIT OF IAN PATTISON**

IAN PATTISON, being duly sworn, deposes and says:

1. I am over 18 years of age and am a citizen of the United Kingdom. I respectfully submit this affidavit in support of SNG's memorandum of law in opposition to GGYC's motion regarding the Deed's constructed in country requirement.

2. I have been working as a sailmaker since 1983. I was employed from February 1999 through June 2000 at North Sails 3DL in Minden Nevada under a H3 U.S. training Visa with the purpose of learning the 3DL sailmaking process. This training did not involve any interaction with the moulding process.

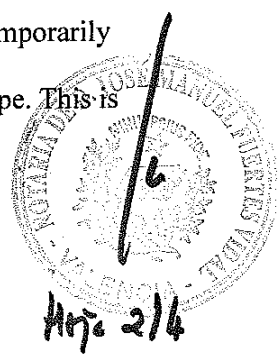
3. Since 2000 I have worked for Alinghi as manager of the sailmaking team. I work closely with the Alinghi sail designers Michael Schreiber and Patrick Mazuay who have also been employed by Alinghi since 2000. My role is to oversee all aspects involved in the production of the team's sails and includes the following:

- The set up of the Alinghi sailmaking facility in Switzerland and sail service and repair facilities in RAK and Valencia. I previously did similar work in Sete, France and Auckland, NZ for the 2003 Americas Cup.
- Detailing all applications used in the production of our sails. Almost all of the components used in the production of Alinghi's sails are custom made. A part of my job is to use my experience as a sailmaker to interact with our design team to enable them to create the most efficient custom designed and made hardware for each required application on the various types of sail.
- My main role as sailmaker is to work directly with our sail designers and the rest of our 8 sailmaking team members to ensure the sail parts received from North Sails are correctly constructed and finished to the exact specifications required by our sailing team.

4. The following describes the construction process of a sail for the Alinghi catamaran in the Villeneuve loft.

- The sail sections arrive in separate crates from 3DL in Nevada sometimes days apart depending on when 3DL have been able to fit the various sections on their moulds.
- The sections are removed from the crates and weighed.

- Each section is unfolded and rolled to remove any creases created during shipping.
- The next step is to create a reference point on each section. From this point we plot measurements provided by the sail designer, accurate to one or two millimetres, required for us to accurately draw luff, leech and foot curves and to allow us to join the sections precisely.
- Once we have created all the required reference points we are ready begin joining the sections together to create the sail. Two of the sail sections are brought together and overlapped to create a seam width. The sections are folded along the edges to be joined and then manipulated to ensure a smooth, even overlap. At this stage the design shape of the sail can be altered if required by the designer by increasing or decreasing the overlap of the seam at various points along its length. By maintaining zero points at one or each end of the seam and increasing the overlap at other points along the seam the sail shape can be flattened. Similarly by decreasing the overlap the sail shape can be deepened.
- Once we have the required seam width the sections are ready to be joined. The edges to be joined are temporarily stuck to the floor using double sided adhesive tape. This is



to prevent the sections from moving during the gluing process. Now a row of 12mm double sided adhesive tape is applied along the centre of the seam and the upper section is again overlaid onto the lower section. The seam is checked one final time to ensure there are no discrepancies and then the 12mm double sided adhesive tape is applied to hold the seam accurately in place.

- The seam is now masked off and the glue can be applied. For this part of the construction a representative of North Sails 3DL was required to fly to Switzerland to explain to our sailmaking team how the seam should be aligned and the glue applied The gluing process requires 3 or 4 people. One person to apply the two part or holt melt glue and two or three people to work the glue evenly throughout the joint to ensure even and smooth coverage.
- Only one face of the joint can be made at a time. This face must be left to cure for a minimum of 12 hours before the joined sections can be un-stuck from the floor, turned over and the gluing process repeated on the opposite face. Again the second face must be allowed to cure for 12 hours before the joined sections can be moved. This whole process is then repeated for each adjoining section until the sail is finally in one piece.

- Now that the sections have been joined and we have a complete unfinished sail the finishing process can begin. Firstly the edges of the sail are accurately measured once again but now from corner to corner as we are able to fully stretch out the one piece membrane. Using our reference points marked in the first measurement we are able to check the overall length of each edge and ensure that the final measurements will match the design sizes. Each edge of the sail is individually stretched out and a 60meter long lofting batten is then laid along that edge passing through the plotted marks made during our first measurement process. The batten is manipulated to create a fair and even curve and then a line is drawn along the batten. This will be the cut edge of the sail. The same process is repeated for each edge of the sail.
- Once all the edges of the sail have been drawn, the sail is trimmed to size along the drawn lines. The offcuts are weighed and deducted from the original section weights to give us an overall trimmed weight before finishing.
- Corner reinforcement patches are now applied to support the 3DL films and help prevent delamination in the corners.
- Heavy polyester and Cuben fibre patches with fibres running in multiple directions are then applied and stitched

to the corners to provide the 3DL membrane with enough strength to enable us to attach the corner hardware or webbing connections.

- Various polyester, spectra, kevlar or carbon fibre materials are now applied to the sail in areas that will require extra strength due to point loads, chafe, bias loads or to prevent the mylar membrane from stretching.
- Polyester edge tapes are applied sewn around the perimeter of the sail to hold control lines and to reinforce and protect the raw cut edge of the sail.
- The corner rings that will allow the sail to actually be attached to the yacht can now be applied. The corner hardware or webbing loops are required to transfer anything from between 5000kg and 20000kgs from the yacht through its rigging, through the attachment points and into the sail membrane. The corner rings are attached by our sailmakers using Dyneema or Kevlar webbings or Dyneema cords depending on the required application. The transition from boat to sail membrane is crucial to the over all strength and performance of the sail and requires a lot of experience in both materials and application in order to ensure that optimum performance can be achieved from the

sail without compromising the structural integrity of either the sail or the boats rigging.

- Sail numbers, Camber stripes, tell tales, sail battens and tie off points for control lines are finally applied and the sail is then ready for sailing.
- The Joining Process from the time the sections arrive at our base in Switzerland to the stage of having the sail in one piece and ready for us to start finishing the sail takes between 60 and 120 man hours depending on the size of the sail.
- The Finishing Process once the sections have been joined takes between 120 and 160 man hours depending on the size and type of the sail.

Dated: January 21, 2010
Valencia, Spain

IAN PATTISON

LEGITIMACIÓN: En Valencia, mi residencia a veintiuno de enero de dos mil diez.
Yo, JOSE-MANUEL FUERTES VIDAL, Notario del Ilustre Colegio de Valencia. -
DOY FE de que la firma que precede, es la perteneciente a **Don IAN BROOKS PATTISON**, con NIE número X-6302178-V. Dicha firma ha sido puesta en mi presencia, y así resulta del Acta número 132 del Protocolo, autorizada por mí el día de hoy conforme al artículo 207,2,2ª del Reglamento Notarial.
En dicha acta, Don IAN BROOKS PATTISON declara conocer el contenido del documento, cuya firma aquí se legitima y quiere que produzca los efectos que le sean aplicables conforme a lo previsto en la legislación de los Estados Unidos de América. ----------
Libro Indicador 51/2010.----------

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