

AFFIDAVIT OF IAN PARSONS

I, Ian Parsons, declare as follows:

1. I am a citizen and a resident of England having a home address of 16A Randolph Crescent, Little Venice, London, W9 1DR.

2. I was an employee of WDP, Ltd. ("WDP"), located at Unit 10, Metro Triangle, 221 Mount Street, Nechells, Birmingham, England B7 5QT, from September 1995 until April 1998. During that time, I was in a management position and had responsibilities in the areas of sales, product development, and importation and exportation of products, among other things. I am personally familiar with the history and operations of WDP during that time and, in particular, with WDP's design, manufacture, and sale of its electronic paintball guns (or "markers") known as the Angel, and the Angel LCD (Liquid Crystal Display).

3. My activities while at WDP were supervised and directed by Gerard ("Jed") Green, John Green, and David Poxon.

4. During late 1995 and early January 1996, WDP was developing an entirely mechanically operated paintball gun that would incorporate the features of two of its other guns. WDP had no plans to create an electrically operated paintball gun at that time, nor had there been any discussions regarding electronically controlling guns.

5. While WDP was developing this mechanical paintball gun, I was directed by David Poxon to attend a paintball tradeshow in Orlando, Florida in January 1996. Mr. Poxon provided me with a video camera and instructed me to video anything new that I saw there. During the tradeshow, I saw Bill Gardner, Jr. from Smart Parts showing and describing an electronically controlled paintball gun. I had never seen an electronically operated paintball gun before that time, nor am I aware of any other electronic paintball gun having been in existence before that time.

6. When I saw Smart Parts' electronically controlled paintball gun, I realized that WDP's efforts to design a new mechanical gun was a complete waste of time. I believed that the electrical control of paintball guns, as was being explained by Mr. Gardner at the tradeshow, was going to completely change the market. I therefore videotaped Mr. Gardner showing and describing the Smart Parts electrically controlled gun to various people.

7. When I returned to WDP with the videotape, immediately following the tradeshow in January 1996, I showed it to Mr. Poxon and John Rice, WDP's technical director. As they viewed the video, they asked me what it was about. I explained to them that it was an electronically controlled paintball gun and further explained its operation to them. I also told them that what WDP was working on was a waste of time and that it would be obsolete before it was even introduced. After viewing this video, Mr. Rice and Mr. Poxon seemed amazed at the direction Smart Parts had taken and WDP immediately abandoned their plans for the mechanical gun and began working on development of a paintball gun that could control loading and firing operations electronically via a circuit board and solenoid valves, using the explanation of the Smart Parts gun I had provided them. This was the first time WDP had ever considered building an electronically controlled paintball gun.

8. WDP's development in this area led to the design, manufacture, and sale of the Angel, and later the Angel LCD, model electronically controlled paintball guns. John Rice and Nicholas Marks were primarily responsible for the design of the Angel and Angel LCD paintball guns.

9. At the time I videotaped the Smart Parts gun and showed the video to Mr. Rice and Mr. Poxon, I was aware of Smart Parts' policy to patent all of its technological developments and assumed that a patent had been, or would be filed, to cover their electronic paintball gun. From my experience with Mr. Rice and Mr. Poxon, as well as Mr. Gerrard Green and Mr. John Green, I believe they were also aware of Smart Part's policy and had similar assumptions. WDP became actually aware of the existence of Smart Parts' patent application on its electronic paintball gun invention at least as early as August 1996, just after Smart Parts' "Shocker" paintball gun was first released to the public in July 1996. WDP obtained a Shocker gun and others at WDP and I read the packaging and literature accompanying the Shocker gun, which contained notices regarding Smart Parts' pending patent application on that technology. Notwithstanding this information, I am not aware of any discussions in which WDP acted concerned over the potential effect of this pending patent nor am I aware of any efforts by WDP to ascertain and/or attempt to avoid the scope of the pending patent. WDP continued

developing their Angel paintball gun with knowledge of, but without regard to, Smart Parts' pending patent application.

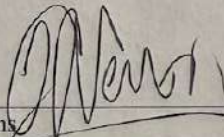
10. WDP's electronically controlled Angel gun was first demonstrated at least as early as March 1997 in a tradeshow in Germany and was probably demonstrated as early as October 1996 in a tradeshow in Orlando, Florida. During the time I worked at WDP, the Angel gun, and its successor, the Angel LCD gun, operated as follows. The Angel and the Angel LCD model guns electrically controlled the filling of a first chamber with compressed gas of a selected pressure, and electrically controlled the transfer of the compressed gas from the first chamber to a second chamber to launch a paintball. These paintball guns also electrically controlled loading a paintball into the second chamber. Specifically, the Angel and Angel LCD guns controlled bolt and ram action via an electronic solenoid valve actuated by a microswitch. The microswitch was activated by pulling a trigger. Activation of the microswitch caused the electronic solenoid valve to direct compressed gas to the ram to move the ram. Movement of the ram caused a firing operation to take place by discharging compressed gas from the first chamber to the second chamber and also caused a bolt movement that loaded a subsequent paintball into the second chamber.

11. The Angel and the Angel LCD paintball guns have been extremely popular among consumers, due primarily to their electrical operation. I believe that as many as 10,000 Angel and Angel LCD paintball guns, or more, have been sold by WDP since being first introduced in 1996.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both.

DATED this 2 day of August, 2000.

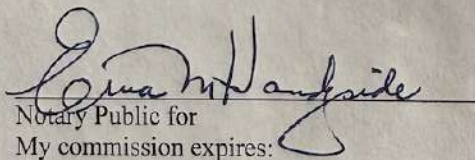
Respectfully Submitted,



Ian Parsons
16A Randolph Crescent
Little Venice, London W9 1DR
England

STATE OF PENNSYLVANIA)
County of Butler) ss.

Before me this 2 day of August, 2000, personally appeared the above-named individual, to me known to be the person who is described in and who executed the foregoing affidavit and acknowledged to me that he executed the same of his own free will.



Notary Public for
My commission expires:

[SEAL]

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Notarial Seal
Erna M. Handyside, Notary Public
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My Commission Expires March 18, 2002
Member, Pennsylvania Association of Notaries

