UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CHRISTOPHER ROLLER,

Plaintiff,

v. Case No. 05-CV-1297

GE MEDICAL SYSTEMS INFORMATION TECHNOLOGIES, INC.,

Defendant.

AFFIDAVIT OF KEVIN IMPECOVEN IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. 1404(a)

State of South Dakota)
) ss
Minnehaha County)

Kevin Impecoven, being first duly sworn under oath, states as follows:

1. I am an adult resident of South Dakota. I base this affidavit on my personal knowledge.

2. I work for GE Medical Systems Information Technologies, Inc. ("GEMS IT") at its Sioux Falls, South Dakota location. In the course of performing my duties on behalf of GEMS IT, I do not engage in business on its behalf in Minnesota.

3. I have no personal contact with Minnesota.

4. I would not voluntarily go to Minnesota for a deposition or a trial in the above matter.

Executed on January 9, 2006.

s/Kevin Impecoven