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ISIS LOVECRUFT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PETER TODD,

Plaintiff,

v.

ISIS LOVECRUFT,

Defendant.

Case No.: 4:19-cv-01751-DMR

**DECLARATION OF BEN ROSENFELD IN
SUPOORT OF DEFENDANT'S MOTION
FOR ADMINISTRATIVE RELIEF
(L.R. 7-11)**

I, Ben Rosenfeld, hereby declare:

1. I am an individual, over the age of 18, and co-counsel for Defendant Isis
Agora Lovecruft in the above-entitled action. If called as a witness, I could and would
testify competently as follows.

2. On July 14, 2019, I obtained the Declaration of Jane Doe (a pseudonym), a
woman who told the defendant that the plaintiff, Peter Todd, had raped her. On July 15,

1 2019, we filed Jane Doe's declaration as Exhibit A to my declaration in support of defendant's
 2 Motion to Strike...Plaintiff's Complaint (Doc. No. 20-4). Jane Doe provided her declaration on
 3 condition that her identity be concealed from the public, stating that she was extremely
 4 traumatized and expressing fear that disclosure of her identity could subject her to further
 5 trauma.

6 3. On July 19, 2019, I realized that a small amount of information contained in
 7 the Declaration of Jane Doe could help to reveal her identity to the public. On the same day,
 8 I called the Clerk's office to ask what could be done. The clerk I spoke to said that he would
 9 seal Document No. 20-4—my declaration and exhibits—in its entirety, pending this
 10 administrative motion to seal. He explained that because my declaration and the exhibits
 11 thereto, including Jane Doe's declaration, were filed in a single document, as attachments,
 12 he would have to seal my entire declaration, rather than just Jane Doe's declaration.

13 4. Because we are only asking to redact just two words in Jane Doe's
 14 declaration (the seventh and eighth words in paragraph 3a), I intend, if the Court grants
 15 this request, to publicly re-file all of the same pages comprising my declaration and exhibits
 16 in Document 20-4, marking it "redacted," and redacting just the seventh and eighth words
 17 in paragraph 3a of Jane Doe's declaration.

18 5. I swear under penalty of perjury that the foregoing is true and correct, except
 19 as to any information stated on information and belief, and as to such information, I believe
 20 that it is true.

21 Sworn and subscribed to at San Francisco, California:

22
 23 July 23, 2019

By: s/ Ben Rosenfeld
 Ben Rosenfeld