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Attorneys for Defendant
ISIS AGORA LOVECRUFT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PETER TODD, an individual,

Plaintiff,

vs.

SARAH MICHELLE REICHWEIN aka ISIS
AGORA LOVECRUFT, an individual,

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)**

1 I, Ben Rosenfeld, hereby declare:

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

5 2. On July 14, 2019, I obtained the Declaration of Jane Doe (a pseudonym), a
6 woman who told the defendant that the plaintiff, Peter Todd, had raped her. On July 15, 2019,
7 we filed Jane Doe's declaration as Exhibit A to my declaration in support of defendant's Motion
8 to Strike...Plaintiff's Complaint (Doc. No. 20-4). Jane Doe provided her declaration on
9 condition that her identity be concealed from the public, stating that she was extremely
10 traumatized and expressing fear that disclosure of her identity could subject her to further
11 trauma.

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

19 4. On August 4, 2019, I obtained Jane Doe's signature to a new declaration in
20 which she agreed to identify herself by her true name, on condition that her new declaration be
21 filed under seal, and that her true name, and certain geographical information which could
22 enable the public to identify her, be redacted from public view. I have reacted her new
23 declaration consistent with this proviso.

24 5. On August 5, 2019, I sought plaintiff's counsel's stipulation to this
25 administrative motion to seal and redact Doe's second declaration, and plaintiff's counsel set an
26 email stating that "Plaintiff does not oppose and stipulates to the motion."

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1 6. I swear under penalty of perjury that the foregoing is true and correct, except as
2 to any information stated on information and belief, and as to such information, I believe it to be
3 true.

4 Sworn and subscribed to at La Jolla, California:

5 Dated: August 5, 2019

6 By: s/ Ben Rosenfeld

Ben Rosenfeld