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8 *Attorneys for Plaintiff and the Proposed Class*

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

13 **JANE DOE**, individually and on behalf of all others  
 14 similarly situated,

15 *Plaintiff,*

16 v.

17 **YOUTUBE, INC.,**

18 *Defendant.*

Civil Case No. 4:20-CV-07493-YGR

**DECLARATION OF STEVEN N.  
 WILLIAMS IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO FILE  
 DECLARATION OF JANE DOE UNDER  
 SEAL**

1 I, Steven N. Williams, declare as follows:

2 1. I am an attorney in good standing with the State Bar of California and admitted to practice  
3 in the Northern District of California. I am a partner in the Joseph Saveri Law Firm, LLP. (“JSLF”). I am  
4 the counsel for the Plaintiff in this action. I have been principally responsible for the action since its  
5 inception. I make this declaration in support of the Plaintiff’s Administrative Motion to File Declaration  
6 of Jane Doe Under Seal.

7 2. For approximately the last seven months, our law firm and clients have been subject to  
8 threatening conduct, including cyberstalking. This appears to be the result of cases filed by the firm.

9 3. The Plaintiff’s sealing request is narrowly tailored. Defendant has advised that it does not  
10 object to the relief sought herein.

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct. Executed on May 8, 2023.

13  
14 /s/ Steven N. Williams  
15 Steven N. Williams  
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