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14 Attorneys for Defendant
15 AMAZON WEB SERVICES, INC.

16
17 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
18
19 IN AND FOR THE COUNTY OF SAN FRANCISCO
20
21 UNLIMITED JURISDICTION
22

23 JOHN DOE, an individual,
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25 Plaintiff,
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27 v.
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29 SUBSTACK, INC., a Delaware Corporation;
30 AMAZON WEB SERVICES, INC., a Delaware
31 corporation; JACK POULSON, an individual;
32 TECH INQUIRY, INC., a Delaware corporation;
33 DOES 1-25, inclusive,
34
35 Defendants.

Case No. CGC-24-618681

**COMPENDIUM OF EVIDENCE IN
SUPPORT OF AMAZON WEB SERVICES,
INC.'S SPECIAL MOTION TO STRIKE
PLAINTIFF'S COMPLAINT PURSUANT
TO CODE OF CIVIL PROCEDURE
SECTION 425.16**

REDACTED.

[Notice of Motion and Special Motion To
Strike, Request For Judicial Notice, and Motion
to File Portions of Special Motion to Strike,
Declaration of Sarah E. Burns, and Exhibits 1-6
Under Seal Filed Concurrently]

Date: January 6, 2025
Time: 9:30 a.m.
Dept.: 302

Action Filed: October 3, 2024

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

12/06/2024
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

1 Defendant Amazon Web Services, Inc. (“AWS”) respectfully submit this Compendium of
2 Evidence in support of its concurrently-filed Special Motion to Strike Plaintiff’s Complaint
3 Pursuant to Code of Civil Procedure Section 425.16.

4 **TABLE OF CONTENTS**

5 Declaration Tab	<u>Declaration of Sarah E. Burns</u>
6 Exhibit 1	News articles published by co-defendant Jack Poulson about 7 (“Plaintiff”) 2021 arrest and his role as CEO of technology 8 company [REDACTED].
9 Exhibit 2	The Incident Report related to Plaintiff’s arrest.
10 Exhibit 3	Online publications about [REDACTED].
11 Exhibit 4	Online publications about Plaintiff’s employment history and 12 work as an executive in the technology sector.
13 Exhibit 5	Op-eds published by Plaintiff.
14 Exhibit 6	Online publications about this lawsuit.

15
16 DATED: December 6, 2024

DAVIS WRIGHT TREMAINE LLP
SARAH E. BURNS
SAMUEL A. TURNER

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19 By: /s/ Sarah E. Burns
20 Sarah E. Burns

21 Attorneys for Defendant
22 AMAZON WEB SERVICES, INC.
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DECLARATION OF SARAH E. BURNS

I, Sarah E. Burns, declare:

1. I am over the age of 18 years old. I am an attorney admitted to practice before all the courts of the State of California and before this Court. I am an associate with the law firm of Davis Wright Tremaine LLP (“DWT”), and I am one of the attorneys representing Defendant Amazon Web Services, Inc. (“AWS”) in this matter. The matters stated below are true of my own personal knowledge, except for those matters stated on information and belief, which I am informed and believe to be true.

2. I am familiar with the Complaint in this lawsuit, which purports to allege claims based on AWS’s hosting of a website containing news articles published by co-defendant Jack Poulson [REDACTED] (“Plaintiff”) [REDACTED] arrest for felony domestic violence and his role as CEO of technology company [REDACTED]. Attached as **Exhibit 1** are true and correct copies of articles published on Mr. Poulson’s blog related to Plaintiff or [REDACTED]. A DWT Document Specialist downloaded each of the following articles from the internet at my direction on December 6, 2024:

- a. [REDACTED]
[REDACTED]
[REDACTED]
- b. [REDACTED]
[REDACTED]
[REDACTED]
- c. [REDACTED]
[REDACTED]
[REDACTED]
- d. [REDACTED]
[REDACTED]
[REDACTED]

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- e. [REDACTED]
- [REDACTED]
- [REDACTED]
- f. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

3. Attached as **Exhibit 2** is the arrest report (“Incident Report”) referenced in paragraph 14 of Plaintiff’s Complaint. I downloaded the Incident Report from the following URL: [REDACTED]

4. Attached as **Exhibit 3** are true and correct copies of online publications about [REDACTED]. A DWT Document Specialist downloaded each of the following articles from the internet at my direction on December 6, 2024:

- a. [REDACTED]
- [REDACTED]
- [REDACTED]
- b. [REDACTED]
- [REDACTED]
- c. [REDACTED]
- [REDACTED]
- [REDACTED]
- d. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

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- e. [REDACTED]
- f. [REDACTED]
- g. [REDACTED]

5. Attached as **Exhibit 4** are true and correct copies of online publications concerning Plaintiff's employment history and work as an [REDACTED]. A DWT Document Specialist downloaded each of the following articles from the internet at my direction on December 6, 2024:

- a. [REDACTED]
- b. [REDACTED]
- c. [REDACTED]
- d. [REDACTED]

1 6. Attached as **Exhibit 5** are true and correct copies of op-eds Plaintiff has published.
2 A DWT Document Specialist downloaded each of the following articles from the internet at my
3 direction on December 6, 2024:

4 a. [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 b. [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 7. Attached as **Exhibit 6** are true and correct copies of publications about this
11 lawsuit. A DWT Document Specialist downloaded each of the following articles from the
12 internet at my direction on December 6, 2024:

13 a. [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

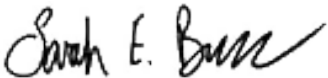
17 b. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 c. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

25 d. [REDACTED]
26 [REDACTED]
27 [REDACTED]
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on December 6, 2024, in Oakland, California.



Sarah E. Burns

EXHIBIT 1

[PROVISIONALLY SEALED]

EXHIBIT 2

[PROVISIONALLY SEALED]

EXHIBIT 3

[PROVISIONALLY SEALED]

EXHIBIT 4

[PROVISIONALLY SEALED]

EXHIBIT 5

[PROVISIONALLY SEALED]

EXHIBIT 6

[PROVISIONALLY SEALED]