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15 *Attorneys for Plaintiff*

16 **SUPERIOR COURT OF STATE OF CALIFORNIA**  
17 **COUNTY OF SAN FRANCISCO**  
18 **[UNLIMITED JURISDICTION]**

19 MAURY BLACKMAN, an individual,

20 *Plaintiff,*

21 v.

22 SUBSTACK, INC., a Delaware  
23 Corporation; AMAZON WEB SERVICES,  
24 INC., a Delaware corporation; JACK  
25 POULSON, an individual; TECH  
26 INQUIRY, INC., a Delaware corporation;  
27 DOES 1-25, inclusive

28 *Defendants.*

Case No.: CGC-24-618681

**DECLARATION OF CAMERON SCHERER**

**REDACTED**

Date: February 4, 2025  
Time: 9:30 AM  
Dept: 301  
Judge: Hon. Joseph M. Quinn

Action Filed: October 3, 2024  
Trial Date: None set

**PUBLIC**

**REDACTS MATERIALS PURSUANT TO COURT'S JANUARY 7, 2025 ORDER**

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28 *Defendants.*

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**DECLARATION OF CAMERON SCHERER**

1 I declare under penalty of perjury and state as follows:

2 1. I make this declaration based on facts set forth herein that are true to my own  
3 personal knowledge, and if called upon to testify thereto, I could and would competently do so  
4 under oath.

5 2. I am a resident of San Francisco, California. I am over 18 years old and fully  
6 competent to submit this affidavit.

7 3. I worked at Premise Data 2017 until 2024.

1           4.     My last position was Director of Operations, reporting to the Chief Operating  
2 Officer, who reported to the CEO.

3           5.     During the time that Maury Blackman and I both worked at Premise Data, from  
4 2017 until the end of 2023, I observed Mr. Blackman work on nearly a daily basis.

5           6.     Premise Data was not a well-known company.

6           7.     I had various insights into the business of Premise Data based on my position.

7           8.     I did not observe Mr. Blackman act in a manner that was reckless, unethical, or  
untrustworthy.

8           9.     Mr. Blackman was not responsible for pivoting the business of Premise Data, and he  
9 did not turn Premise Data into a secret military surveillance company.

10          10.    I did not observe Mr. Blackman neglect the safety of Premise Data employees.

11          11.    I am not aware of any instances when Premise Data employees were executed on the  
12 side of the road in Iraq.

13          12.    I am not aware of any Premise Data employees being physically harmed as a result  
14 of performing their job.

15          13.    In or around September 2023, I read a blog published by Jack Poulson on Substack  
16 that reported that Mr. Blackman [REDACTED]

17          14.    Mr. Poulson's blog was written in such a way that I believed Mr. Blackman had  
[REDACTED]

18          15.    I spoke with several colleagues at Premise Data about Mr. Poulson's blog post  
19 around the time his blog post was first published. Every colleague with whom I discussed these  
20 issues believed based on Mr. Poulson's blog posts that Plaintiff had [REDACTED]  
[REDACTED]

21          16.    Mr. Poulson also reported that Premise Data's Board made Mr. Blackman leave the  
22 Company because of [REDACTED] This made me believe that Mr. Blackman was either guilty of the  
23 conduct described by Mr. Poulson or that these legal matters were still ongoing because the Board  
24 would not have removed him as a result of an arrest if he was [REDACTED]  
[REDACTED]

25          17.    After Mr. Blackman left Premise Data, I was involved in several conversations with  
26 colleagues about Mr. Poulson's blog posts. These people said that they also thought Mr. Blackman  
27 [REDACTED] based on what they read in Mr. Poulson's blog posts.

1 I declare under penalty of perjury to the laws of the State of California that the foregoing facts are  
2 true and correct.

3 Executed on January 14, 2025

4 San Francisco, California.

/s/ Cameron Scherer  
Cameron Scherer (Jan 14, 2025 09:34 PST)

Cameron Scherer