1 2 3 4 5 6	SUSAN E. SEAGER, SBN 204824 LAW OFFICES OF SUSAN E. SEAGER 128 N. Fair Oaks Avenue Pasadena, CA 91103 Email: susanseager1999@gmail.com Attorney for Defendant TECH INQUIRY, INC.	FILED Superior Court of California, County of San Francisco  04/25/2025 Clerk of the Court BY: WILMA CORRALES Deputy Clerk	
7 8 9			
10	SUPERIOR COURT OF THI	E STATE OF CALIFORNIA	
11	COUNTY OF SA	N FRANCISCO	
12			
13	MAURY BLACKMAN, an individual,	) CASE NO.: CGC-24-618681	
14	Plaintiff,	DECLARATIONS OF SUSAN E. SEAGER WITH EXHIBITS A-B	
15	V	) SEAGER WITH EXHIBITS A-B ) [C.C.P. 425.16(c)]	
16 17 18 19	SUBSTACK, INC., a Delaware corporation; AMAZON WEB SERVICES, INC., a Delaware corporation; JACK POULSON, an individual; TECH INQUIRY, INC., a Delaware corporation; DOES 1-25, inclusive, Defendants.	Date: July 29, 2025 Time: 9:00 a.m. Dept.: 301 Before: Hon. Christine Van Aken  Action Filed: October 3, 2024 Trial Date: None Set	
20			
21			
22		) )	
23			
24	DECLARATION OF	SUSAN E. SEAGER	
25	I, Susan E. Seager, declare:		
26	1. I am an attorney licensed to practi	ce law before the courts of the state of California	
27 28	and I am counsel of record for defendant Tech In	nquiry, Inc. in this action. I submit this	
20	CGC-24-618681 DECLARATION OF SUSAN E. SEA	AGER	

Declaration in support of the Motion Of Defendants Poulson, Substack, Inc., And Tech Inquiry, Inc. To Recover Fees And Costs. The facts stated below are true to my personal knowledge, except those matters stated on information and belief, which I am informed and believe to be true.

2. I am a solo practitioner in the Law Office of Susan E. Seager in Pasadena, California. I agreed to represent Defendant Tech Inquiry, Inc. this case on a pro bono basis. My legal services agreement with Tech Inquiry states that I will not charge Tech Inquiry for my legal fees or court costs, but that if I were successful in filing and winning an anti-SLAPP motion on behalf of Tech Inquiry, that I will seek recovery of my fees from the Plaintiff pursuant to the anti-SLAPP statute, specifically Code of Civil Procedure § 425.16(c). I told Tech Inquiry I had experience filing anti-SLAPP motions and fighting lawsuits that seek injunctive relief ordering the removal of lawfully obtained government records posted by journalists on the internet.

#### I. Hours Worked

3. I have worked a total of 58.80 hours drafting Tech Inquiry's anti-SLAPP motion and related matters, as explained in more detail below, and 4.70 hours on Defendants' joint fee motion and this Declaration, for a total of 63.50 hours to date. Attached as Exhibit A is a true and correct copy of my timesheets. I use an Excel spreadsheet and adding function to record and add up my hours.

Hours Worked	Task	Total Fees
27.50	Anti-SLAPP Motion	
8.30	Reply in Support of Anti-SLAPP motion	
1.90	Anti-SLAPP Hearing	
0.6	Opp to Pl's Notice of Related Case	
4.40	Opp. to Pl's Ex Parte App. for TRO	
16.1	Opp. to Pl's Motion to Seal Arrest Report	
4.7	Defs' Fee Motion	
Total hours: 63.50 x \$950		\$60,325

- 4. I worked 27.5 hours conducting research and drafting Tech Inquiry's anti-SLAPP motion, 8.30 hours on the reply brief, and 1.90 hours preparing for and appearing at the hearing. I have written numerous anti-SLAPP motions in my career, so I did not need to "reinvent the wheel." In Tech Inquiry's anti-SLAPP motion, I added a unique argument not made by the other defendants: that the highly unusual California statute used by Plaintiff to sue Tech Inquiry for the publication of Plaintiff's sealed arrest report, Penal Code § 851.92(c), is unconstitutional. The statute provides that "a person or entity ... who disseminates information relating to a sealed arrest is subject to a civil penalty of not less than five hundred dollars (\$500) and not more than two thousand five hundred dollars (\$2,500) per violation" and permits a "private right of action." Penal Code § 851.92(c). The statute became effective in 2018 and Plaintiff apparently filed the first California lawsuit based on the statute barring dissemination of a sealed arrest report. Although the superior court declined to rule on Tech Inquiry's constitutional challenge to the statute, Tech Inquiry has preserved that issue for Plaintiff's appeal. Tech Inquiry also argued that its publication of Plaintiff's lawfully obtained arrest report was protected by the absolute California fair report privilege, preserving that issue for appeal. To avoid duplicating work by other defense counsel on Tech Inquiry's anti-SLAPP motion, I cited the declarations and exhibits filed by co-defendant Jack Poulson in Tech Inquiry's anti-SLAPP motion rather than create duplicate declarations and exhibits.
- 5. I also worked 16.10 hours conducting research and drafting a joint opposition with co-defendant Electronic Frontier Foundation to Plaintiff's motion to seal his lawfully obtained arrest report, which was filed as an exhibit in the anti-SLAPP litigation.
- 6. I also worked 4.40 hours drafting a joint defense opposition to Plaintiff's ex parte application for a temporary restraining order to remove the already published copy of his lawfully obtained arrest report from the public websites Tech Inquiry and Substack. I warned Plaintiff's counsel David Marek before he filed the ex parte application for the TRO that such a request would be rejected by the court as an unconstitutional prior restraint.

7. I am not seeking hours for court filings or other tasks typically completed by support staff.

#### II. My Hourly Rate

8. My hourly rate is \$950. This rate reflects the prevailing hourly rates for attorneys of comparable education, expertise, and experience in SLAPP litigation in the Bay Area. *See Mogan v. Sacks, Ricketts & Case LLP*, 2022 WL 1458518, at \*2 (N.D. Cal. May 9, 2022) (finding rates of \$1,015.75 for partner reasonable in Bay Area SLAPP case) *aff'd* 2023 W.L. 2983577 (9th Cir. April 18, 2023); *Sols. 30 Eur., S.R.L. v. Muddy Waters Cap. LLC*, 2022 WL 1814439, at \*2 (N.D. Cal April 28, 2022) (finding rates of \$980 for partner with 40 years of experience "at or below the median ranges for lawyers with comparable experience in SLAPP case in Bay Area); *Open Source Sec., Inc. v. Perens*, 2018 WL 2762637, at \*7 (N.D. Cal. June 9, 2018) (finding rates of \$880 and \$995 for experienced partners in SLAPP litigation in Bay area reasonable).

#### **III.** My Qualifications

- 9. I have 25 years of experience as a media defense attorney litigating First Amendment cases in state and federal courts. The details of my law career are contained my curriculum vitae, attached as Exhibit B.
- 10. I am a 1999 graduate of Yale Law School, which I attended when I was in my early 40s with two young children and a supportive spouse. I practiced media defense litigation from 1999 to 2007 at Davis Wright Tremaine LLP in Los Angeles, a preeminent national media defense law firm, where I litigated numerous cases defending media clients against lawsuits alleging defamation, invasion of privacy, right of publicity, and requests for unconstitutional prior restraints. I was the primary author on several successful anti-SLAPP motions in superior court and defending those victories in appeals, including *Seelig v. Infinity Broadcasting Corp.* (2002) 97 Cal.App.4th 798 (2002) and *Daly v. Viacom* (N.D. Cal. 2002) 238 F. Supp. 2d 1118.
- 11. I was the primary author and successfully argued a First Amendment challenge to a new state divorce court secrecy statute in Los Angeles Superior Court, a ruling that was affirmed on appeal. (*In re Marriage of Burkle* (2006) 135 Cal.App.4th 1045). I also filed motions to unseal

court records in both state and federal courts based on the First Amendment and common law right to court records. From 2007 to 2016, I worked in-house for Fox Group Legal in the Fox Entertainment Group, working with outside counsel to defend locally owned and operated television stations (not Fox News, a separate cable station) from lawsuits alleging defamation, invasion of privacy, and other claims. I worked with outside counsel, Holland & Knight, to file the first anti-SLAPP motion using the then-new anti-SLAPP statute in the District of Columbia in *Lehan v. Fox Television Stations, Inc.*, 2011 WL 11535276 (D.C. Super. Ct. Nov. 30, 2011).

- 12. From 2018 to early 2025, I worked as a contract attorney for Davis Wright Tremaine, providing pre-publication legal advice for documentaries and true crime television series.
- 13. I have been teaching media law since 2001. From 2001 to 2021, I worked as a lecturer teaching a Seminar in Mass Communications Law to journalism students at the University of Southern California, Annenberg School for Communication and Journalism. From 2018 to 2019, I worked as a lecturer teaching First Amendment to law students and Copyright, Trademark and Related Rights to LLM students at the University of Southern California, Gould School of Law. From 2018 to present, I have worked at the University of California, Irvine School of Law, where I founded the Press Freedom Project. The law clinic trains laws students by providing pro bono legal services to freelance journalists, non-profit news organizations, government accountability non-profits, documentary filmmakers and others. I began as a lecturer and now I am employed as an adjunct clinical law professor. Our clinic won a published California Court of Appeal decision expanding rights of public to obtain juvenile case files of children killed while under purported protection of juvenile court. Therolf v. Superior Court (2022) 80 Cal. App. 5th 308. In another clinic case, City of Los Angeles v. Camacho, the City of Los Angeles agreed to dismiss its lawsuit against client Ben Camacho, freelance journalist, and pay \$300,000 in attorney's fees to Mr. Camacho's defense counsel team after the City wrongfully sued Mr. Camacho for publishing official headshot photographs of Los Angeles Police

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Department officers, which Mr. Camacho lawfully obtained from the City as part of its settlement of his Public Records Act lawsuit.<sup>1</sup>

- 14. I have also written numerous articles about First Amendment issues and cases, including Jackpot! Presumed Damages Gone Wild and Unconstitutional, 31 *Communications Lawyer* 1 (January 2015)<sup>2</sup>, Forget Conditional State Fair Report Privileges; the Supreme Court Created an Absolute Fair Report Privilege in *Cox Broadcasting v. Cohn* Based on the First Amendment over 40 Years Ago, 32 *Communications Lawyer* 2 (Summer 2016)<sup>3</sup>, and Donald J. Trump Is a Libel Bully But also a Libel Loser, 35 *Communications Lawyer* 3 (Fall 2016).<sup>4</sup>
- 15. I have been quoted by media outlets about my work and issues of government secrecy and Donald J. Trump's many defamation lawsuits, including by the *New York Times* and *Washington Post*, mostly recently by the *San Francisco Standard* and Spectrum News 1.
- 16. My awards include the Los Angeles Press Club 2022 Guardian Award for Contributions to and Protection of the First Amendment for my work on behalf of journalists at UC Irvine School of Law Press Freedom Project; *Los Angeles Daily Journal*'s 2006 Top 75 Women Litigators; and *Los Angeles Daily Journal's* 2005 Top 75 Women Litigators.
- 17. I have spoken on panels about litigation to obtain government and court records, including Yale Law School's Access and Accountability Conference in 2024, 2019, and 2018.

#### IV. Fees

18. As set forth in the attached Exhibit A, I have worked a total of 63.50 hours on Tech Inquiry's anti-SLAPP motion, opposing Plaintiff's related motions, and this fee motion. I am

<sup>&</sup>lt;sup>1</sup> <u>https://www.fox44news.com/news/national-world-news/ap-los-angeles-will-pay-300000-to-settle-a-lawsuit-against-journalist-over-undercover-police-photos/</u>

http://www.americanbar.org/publications/communications\_lawyer/2015/january/jackpot.html

<sup>&</sup>lt;sup>3</sup> http://www.americanbar.org/content/dam/aba/publications/communications\_lawyer/cl-v32-2summer16.authcheckdam.pdf;

 $<sup>\</sup>underline{https://www.americanbar.org/content/dam/aba/publications/communications}\underline{lawyer/fall2016/cl3}\underline{23.pdf}$ 

seeking \$950 per hour, for a total of \$60,325 in attorney's fees. I have incurred \$495 in court costs: a \$435.00 first appearance fee and \$60.00 filing fee to file the anti-SLAPP motion. I am seeking a total of \$60,820 in attorney's fees and costs. I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct to the best of my knowledge. Executed this 23rd day of April, 2025 in South Pasadena, California. 

# Exhibit A

Date	Time	Task
11/		Review email from D. Greene regarding representing Tech Inquiry and filing special motion to strike complaint (.1); telephone conference with D. Greene regarding representing Tech Inquiry and filing special motion to strike complaint (.2)  Research John Doe v. Substack complaint and plaintiff's public figure status and online presense for special motion to strike complaint (1.5)
	0.	Telephone conference with J. Poulson regarding representation of Tech Inquiry and .4 filing special motion to strike complaint (.2); draft answer to complaint (.2)  Telephone conference with D. Marek regarding representation of Tech Inquiry and filing stipulation extending time to respond to complaint and merits of case (.2)  Draft joint stipulation and proposed order extending time for Tech Inquiry to respond to complaint (.9)
11/9/2	4	Draft legal services agreement with Tech Inquiry
		Draft and send email to J. Poulson regarding special motion to strike and case
11/9/2	4 0.	.4 update, and sending legal services agreement Phone interview with J. Poulson to gather facts for special motion to strike,
11/11/2	4 0.	.8 complaint
11/12/2	4 3	Draft opposition to ex parte application for TRO and send to D. Greene (3.0); review and revise opposition to ex parte application for TRO and send to D. Green (.7)

Review signed delcaration by J. Poulson for opposition to TRO (.1); conference call with D. Greene regarding ex parte hearing for TRO (.1); review joint opposition by J. 11/13/24 0.7 Poulson and Tech Inquiry to ex parte application for TRO (.3); attend TRO hearing (.1)

Total 7.8

3.40 SLAPP4.40 TRO

Date	Time	Task
12/4/2	4 3	.4 Draft Special Motion to Strike Plaintiff's Complaint
12/5/2	4 7	.2 Draft Special Motion to Strike Plaintiff's Complaint
12/6/2	<b>4</b> 6	.3 Draft Special Motion to Strike Plaintiff's Complaint
12/7/2	4 2	.1 Revise and finalize Special Motion to Strike Plaintiff's Complaint
		Draft Opposition to Plaintiff's Motion to Seal Arrest Report Court Exhibit (1.1);
		review and revise Joint Stipulation moving hearing dates for anti-SLAPP motions (.3); email D. Greene regarding edits to joint Stipulation moving hearing dates on
12/18/2	4 1	.5 anti-SLAPP motion (.1)
		Draft Opposition to Plaintiff's Motion to Seal Arrest Report Exhibits in anti-SLAPP
12/19/2	4 6	.2 motions
- 1-		Draft Opposition to Plaintiff's Motion to Seal Arrest Report Exhibits in anti-SLAPP
12/20/2	4 4	.5 motions

Review court Order denying Joint Stipulation to move hearing date for anti-SLAPP motions (.1); review email chain from D. Greene, J. Baskin, S. Burns regarding court order denying Jt Stip to move hearing date for anti-SLAPP motions (.1); review email from D. Marek regarding court order deying Jt Stip to move hearing date for anti-SLAPP motions (.1)

12/20/24

0.3 SLAPP motions (.1)

Review D. Marek's email providing notice of planned ex parte application to move hearing date for Defs' Anti-SLAPP motions and combined opposition brief (.1); email D. Marek regarding failure to serve Tech Inquiry with Ex Parte Notice regarding hearing on anti-SLAPP motions (.1); telephone conference with D. Marek regarding failure to serve Tech Inquiry with Ex Parte Notice on hearing on anti-SLAPP motions (.1); review Pls Ex Parte Notice to move hearing on anti-SLAPP motions (.2); review email from D. Greene regading filing notice of joinder to Pls Ex Parte App to move hearing date for anti-SLAPP motions (.1); draft Ntc of Joinder to Pls Ex Parte Notice

12/23/24

4.2 to move hearing on anti-SLAPP motions and Seager Declaration (3.6)

12/24/24

Attend Zoom hearing on PI's Ex Parte App to advance hearing and file combined opp 0.6 to Defs' anti-SLAPP motions (.6)

Review email chain from J. Baskin, D. Greene, S. Burns regarding Defenants Opposition to Plaintiff's Notice of Related Case (.1); review Defs. Opp to Pls Ntc of Related Case (.2); compose and send email to S. Burns regarding edits to Defs Opp to Pls Ntc of Related Case (.1); review revised Defs Opp to Pls Ntc of Related Case (.1); compose and send email to S. Burns regarding revised Defs Opp to Pls Ntc of 0.6 Related Case (.1)

12/31/24

Total 36.9

24.1 - Anti-SLAPP

12.2 - Opp to Sealing Arrest Report Exhibit in ant9-SLAPP

0.6 - Opp. to Notice of Related Case

Date	Time	Task
1/3/25	1.	Review tentative court ruling granting Plaintiff's Motion to Seal Arrest Report filed as Exhibits for anti-SLAPP motions (.2); Zoom conference with D. Greene and V. Noble regarding tentative ruling on Pl's Mot. to Seal Arrest Report Exhibits (.5); conduct research to contest tentative court ruling on Pls Mot. to Seal Arrest Report Exhibits (.5); compose and send email to court and parties giving notice that Tech Inquiry will contest 3 tentative ruling on Pls Mot to Seal Arrest Report Exhibits (.1)
		Prepare for oral argument on Pls Mot. to Seal Arrest Report
1/6/25	1.	3 Court Exhibits (.7); attend hearing on PI's Mot. to Seal (.6)
1/27/25	0	Meet and confer with D. Marek regarding redactions of reply 2 in support of anti-SLAPP motion (.2)
1/27/25		1 Reply in support of anti-SLAPP motion
1/2//23	۷.	1 Reply III Support of anti-SLAFF motion
1/28/25	5.	5 Reply in support of anti-SLAPP Motion
		Corrected Amended Memo of P's and A's ISO anti-SLAPP
1/29/25	0.	5 Motion
TOTAL	10.	9

### Blackman Time January 2025

- 2.6 Opp to motion to seal arrest report exhibit in anti-SLAPP
- 8.3 Reply in support of anti-SLAPP motion

Date Time Task

> Review tentative court ruling granting Plaintiff's Motion to Seal Arrest Report filed as Exhibits for anti-SLAPP motions (.2); Zoom conference with D. Greene and V. Noble regarding tentative ruling on PI's Mot. to Seal Arrest Report Exhibits (.5); conduct research to contest tentative court ruling on Pls Mot. to Seal Arrest Report Exhibits (.5); compose and send email to court and parties giving notice that Tech Inquiry will contest

2/3/25

1.3 tentative ruling on Pls Mot to Seal Arrest Report Exhibits (.1)

Prepare for hearing on anti-SLAPP Motion (1.0); draft and email Dept. 301 Proposed Order granting anti-SLAPP motion (.2); attend anti-SLAPP motion (.5); review emails amoung counsel for co-defendants regarding preparing joint Proposed Order granting all anti-SLAPP motions (.1); review joint Proposed Order granting all anti-SLAPP motions and send email

2/4/25

1.9 to S. Burns with edit to Proposed Order (.1)

Total

3.2

- 1.3 Opp to motion to seal arrest report exhibit to anti-SLAPP
- 1.9 Anti-SLAPP motion hearing and proposed order

## Blackman / Tech Inquiry April 2025

Date	Time	lask
		Review time sheets for fee motion (1.0): revise joint fee motion (1.1); draft Seager
4/22/2	.5	5.6 declaration for fee motion (3.0); update CV as exhibit (.5)

Total 5.6

# Exhibit B

### Susan E. Seager

Law Office of Susan E. Seager/ 128 North Fair Oaks Avenue, Pasadena / California 91103 SusanSeager1999@gmail.com / cell: (310) 890-8991

#### **EDUCATION**

Yale Law School, Juris Doctorate 1999

Yale Law & Policy Review, Senior Editor

- Coker Fellow teaching assistant for Visiting Professor James Boyle (Duke Law School)
- Research assistant for Visiting Professor Jonathan Simon (Miami Law School)
- Legal Practice Clinics: Advocacy for Parents and Children, Environmental Protection Clinic
- Papers: Unconstitutional Internet Censorship: The Child Online Protection Act of 1998, 1 *Yale Cyberlaw Roundtable* 1 (1999); *Nathaniel Gordon: The Yankee Slave Trader* (1999)
- Activities: Co-chair, Yale Law Women. Organized seminar on campaign finance reform

<u>University of Maine School of Law</u>, 1997-98 (J.D. candidate). Class Rank: 1 Awarded competitive paid summer clerkship with two Portland administrative law judges

Stanford University, Bachelor of Arts, 1977. Major: studio art (photography), with distinction

#### TEACHING EXPERIENCE

Law School, Clinical Teaching

2018-2020. Lecturer

University of California, Irvine School of Law, Irvine, California

Intellectual Property, Arts, and Technology Clinic, Press Freedom and Trans. Practice

 Created and directed part-time Press Freedom and Transparency Practice to provide pro bono legal services to independent journalists, non-profit news organizations, open government nonprofits, documentary filmmakers, independent photojournalists

2020-present. Adjunct Clinical Professor of Law

University of California, Irvine School of Law, Irvine, California

Intellectual Property, Arts, and Technology Clinic, Press Freedom Project

- Direct students in Press Freedom Project as full-time clinical program in IPAT clinic to provide pro bono legal services to independent journalists, non-profit news organizations, open government non-profits, documentary filmmakers, independent photojournalists
- Awarded three grants totaling \$885,000 from Legal Clinic Fund For Local News and University of California, Berkeley to expand and support Press Freedom Project
- Supervise students in litigation tasks, including drafting motions, oral argument, discovery
- Won published California Court of Appeal decision, *Garrett Therolf v. Superior Court*, expanding rights of public to obtain juvenile court records of children killed while under juvenile court protection
- Won trial court decisions ordering government agencies and courts to release variety of government records, including medical records for prisoners who died during COVID in California prisons, records of police misconduct, settlement records against local sheriff's department and district attorney's office, state grand jury transcripts, juvenile court records, child abuse hotline calls, police body camera footage

- Supervised students composing appellate briefs in California Court of Appeal in *City of Los Angeles v. Camacho* and *Media Coalition v. Superior Court*, which are pending cases Won \$90,000 settlement for student journalist wrongfully arrested, strip-searched, and had his cell phone illegally searched by Los Angeles County Sheriff's Department Won attorney's fees totaling \$118,000 in California Public Records Act cases
- Supervised students drafting amicus brief on behalf of International Documentary Association in *De Havilland v. FX* in California Court of Appeal, arguing that First Amendment gives documentary filmmakers right to use name and likeness of the rich and powerful

#### Law School, Doctrinal Teaching

Spring 2018, Spring 2019. Lecturer

University of Southern California, Gould School of Law, Los Angeles, California

First Amendment

- Taught First Amendment survey course covering freedom of speech and press, right to petition and of assembly, free exercise of religion, and bar against government establishment of religion
- Used interactive methods and experience as a media litigator to make First Amendment jurisprudence accessible in context of contemporary events

Fall 2018, Spring 2019. Lecturer

University of Southern California, Gould School of Law, Los Angeles, California

Copyright, Trademark and Related Rights

Taught survey course for LLM students on copyright, trademark, trade secrets, and right of publicity

#### Journalism School, Doctrinal Teaching

Spring 2001-Fall 2017, Summer 2018-2021. Lecturer

<u>University of Southern California, Annenberg School for Comm. and Journalism,</u> Los Angeles, California Seminar in Mass Communication Law

Taught undergraduate and graduate journalism students about free press rights and avoiding claims for defamation, privacy, copyright, trademark, right of publicity

#### PRIVATE PRACTICE LAWYER EXPERIENCE

December 2017-2025, Contract Attorney; Media/Entertainment Practice Group

Davis Wright Tremaine LLP, Los Angeles, California

Pre-publication advice and litigation defense for documentaries, docuseries, newspaper stories, and scripted content for Netflix, HBO, NBC Universal, Facebook, Apple, Amazon, *The Hollywood Reporter*, documentary filmmakers, independent producers on legal risks for defamation, privacy, right of publicity, copyright, and trademark liability

September 2016-present, Solo Practitioner

Law Office of Susan E. Seager. Pasadena, California

California Public Records Act litigation, anti-SLAPP litigation, pre-publication advice

July 2007-June 2016, Senior Counsel, Vice President, Fox Group Legal, Litigation

Fox Entertainment Group LLC. Los Angeles, California

• Supervised outside law firms hired for litigation for various news and entertainment companies, including local Fox Television Stations (not Fox News), Twentieth Century Fox Film Corporation, Twentieth Century Fox Television, FX, National Geographic Channels, related to defamation,

privacy, right of publicity, copyright, trademark, idea submission, breach of contract, and reporter's shield laws

 Pre-publication advice on scripted television, reality television, movies, and documentaries on legal risks for defamation, privacy, right of publicity, copyright, and trademark liability
 Coordinated with Motion Picture Association of America on amicus litigation and legislative lobbying regarding First Amendment, violence in films, right of publicity, SLAPP legislation

1999-2007. Associate Attorney, Communications, Media, IP & Technology Practice Group Davis Wright Tremaine LLP. Los Angeles, California

- Litigation, appellate briefing, and oral advocacy on behalf of media companies, including *Los Angeles Times*, CNN, *New York Times*, TMZ
- Litigated defamation, right of publicity, privacy, idea submission, copyright, access to court proceedings and records; litigated third-party subpoenas and reporter shield law cases
- Pre-publication advice for comedy television programming, news reports, and reality television on legal risks for defamation, privacy, right of publicity, copyright, trademark liability

Summer 1998. Summer Associate (split summer)
Heller Ehrman LLP. Los Angeles, California
Natural Resources Defense Council. Los Angeles, California

#### JOURNALISM EXPERIENCE

2016-2017.

First Amendment Staff columnist covering speech-related issues during first years of first term of President Donal J. Trump for *TheWrap*; freelance writer for *Law Newz*, *Daily Beast* 

1982-1996.

Freelance reporter: New York Times, Boston Globe, This Old House (1995-96). Staff writer: LA Weekly (1994-95); Los Angeles Daily Journal (1990-94); Los Angeles Herald Examiner (1989); United Press International (1984-88); San Luis Obispo Telegraph Tribune (1982-84); City News Service (1982)

#### PRE-PROFESSIONAL EXPERIENCE

1977-1982. Copy Messenger/Freelance Writer (*Los Angeles Times*), Summer Session Photo Teacher (Stanford U.), Photojournalist (*LA Reader*), Band Manager (B People), Waitress/Bookkeeper (¡Arriba!)

#### **PUBLICATIONS**

**ARTICLES** (*solo authorship unless otherwise noted*)

- Jackpot! Presumed Damages Gone Wild and Unconstitutional, 31 *Communications Lawyer* 1 (January 2015),
  - http://www.americanbar.org/publications/communications lawyer/2015/january/jackpot.html
- Forget Conditional State Fair Report Privileges; the Supreme Court Created an Absolute Fair Report Privilege in *Cox Broadcasting v. Cohn* Based on the First Amendment over 40 Years Ago, 32 *Communications Lawyer* 2 (Summer 2016),
  - http://www.americanbar.org/content/dam/aba/publications/communications\_lawyer/cl-v32-2summer16.authcheckdam.pdf

- Donald Trump Can't Shut Down New York Times Tax-Leak Showing He Lost Nearly \$1 Billion in 1995, Daily Beast, Oct. 2, 2016, <a href="http://www.thedailybeast.com/articles/2016/10/02/donald-j-trumpcan-t-shut-down-new-york-times-tax-story.html">http://www.thedailybeast.com/articles/2016/10/02/donald-j-trumpcan-t-shut-down-new-york-times-tax-story.html</a>
- A legal case against the LAPD's policy of keeping videos secret, Los Angeles Times, Oct. 6, 2016, <a href="http://www.latimes.com/opinion/op-ed/la-oe-seager-police-video-public-records-law-20161004-snap-story.html">http://www.latimes.com/opinion/op-ed/la-oe-seager-police-video-public-records-law-20161004-snap-story.html</a>, https://www.chicagotribune.com/la-oe-seager-police-video-public-records-law20161004-snap-story.html
- Donald J. Trump Is a Libel Bully But also a Libel Loser, 35 Communications Lawyer 3 (Fall 2016), <a href="https://www.americanbar.org/content/dam/aba/publications/communications\_lawyer/fall2016/cl323.p">https://www.americanbar.org/content/dam/aba/publications/communications\_lawyer/fall2016/cl323.p</a>
   df
  - John Oliver Owes It All to Hustler v. Falwell, *Law Newz*, Nov. 5, 2016, http://lawnewz.com/opinion/john-oliver-owes-it-all-to-hustler-v-falwell/
  - Is There a First Amendment Right to Hire 'Buxom' Weather Reporters?, *TheWrap*, March 17, 2017, <a href="https://www.thewrap.com/first-amendment-buxom-weather-reporters-kyle-hunter-jacki-johnsonevelyn-taft-bachelor-rachel-lindsay/">https://www.thewrap.com/first-amendment-buxom-weather-reporters-kyle-hunter-jacki-johnsonevelyn-taft-bachelor-rachel-lindsay/</a>.
- No, Google Did Not Violate Daily Stormer's First Amendment Rights, *TheWrap*, Aug. 14, 2017 <a href="https://www.thewrap.com/google-daily-stormer-first-amendment-did-not-violate/">https://www.thewrap.com/google-daily-stormer-first-amendment-did-not-violate/</a>.
- PETA Monkey Selfie Lawsuit Settled, and We May Never Know if Animals Can Hold Copyrights, *TheWrap*, Sept. 11, 2017, https://www.thewrap.com/peta-settles-monkey-selfie-copyright-lawsuit/
- No, There Isn't a Double Standard for Conservatives and Liberals on Social Media, *The Los Angeles Times*, July 12, 2019, <a href="https://www.latimes.com/opinion/op-ed/la-oe-seager-trump-twitter-socialmedia-conservatives-20190712-story.html">https://www.latimes.com/opinion/op-ed/la-oe-seager-trump-twitter-socialmedia-conservatives-20190712-story.html</a>
- The Hollywood sign is a public treasure, no one should have to pay to use its image, *The Los Angeles Times*, April 26, 2020 (by Susan E. Seager and Sachli Balazadeh-Nayeri)
- <u>Flawed court rule, flawed forms invite erroneous rulings in juvenile court</u>, Los Angeles Daily Journal, June 17, 2021 (by Susan E. Seager and Benjamin Whittle)

#### PRESENTATIONS, PANELS, AND TESTIMONY

- Panelist, Access and Accountability Conference, Yale Law School, Nov. 5, 2024, New Haven, Connecticut
- Panelist, Access and Accountability Conference, Yale Law School, Oct. 5, 2019, New Haven, Connecticut
- Panelist, Access and Accountability Conference, Yale Law School, Oct. 13, 2018, New Haven, Connecticut
- Panelist, "Free Speech in Hateful Times: Navigating the First Amendment after Charlottesville," Shaking the Foundations conference, Stanford Law School, Nov. 4, 2017, Stanford, California.
- Panelist, "The First Amendment in the Age of Trump," sponsored by *TheWrap*, Nov. 4, 2017, Mountain View, California
- Panelist, "The First Amendment in the Age of Trump," screening of Netflix documentary *Nobody Speak: Trials of the Free Press*, sponsored by *TheWrap*, July 6, 2017, Los Angeles, California
- Presentation, "President-elect Donald Trump, Past and Future: How Trump's Bullying Ways Might Impact Journalism and the Media Industry," Los Angeles Copyright Society Dinner Meeting, Jan. 9, 2017, Beverly Hills, California
- Panelist, "Section 230 of the Communications Decency Act: Bulwark No More?", MLRC California Chapter Quarterly Lunch Meeting, Oct. 19, 2016, Los Angeles, California

- Panelist, "Recent Developments in Right of Publicity," Black Entertainment and Sports Lawyers Association (BESLA) conference, June 23, 2016, Los Angeles, California
- Public testimony, Florida Senate Judiciary Committee hearing on proposed revisions to SLAPP statute allowing quick dismissal of meritless defamation lawsuits, on behalf of Motion Picture Association of America, March 2015, Tallahassee, Florida
- Panelist, "Hot Issues in Libel and Privacy," American Bar Association Forum on Communications Law, February 2015, Scottsdale, Arizona

#### MEDIA INTERVIEWS AND APPEARANCES

- Spectrum News 1, https://www.instagram.com/katecagle/reel/DHJtJ0YyEEF/, March 13, 2025.
- San Francisco Standard, <a href="https://sfstandard.com/2025/04/15/daniel-lurie-mayor-san-francisco-texts/">https://sfstandard.com/2025/04/15/daniel-lurie-mayor-san-francisco-texts/</a>, April 15, 2025.
- San Francisco Standard, <a href="https://sfstandard.com/2025/04/02/daniel-lurie-san-francisco-mayor-public-records-texts/">https://sfstandard.com/2025/04/02/daniel-lurie-san-francisco-mayor-public-records-texts/</a>, April 2, 2025.
- Los Angeles Times, <a href="https://www.latimes.com/california/story/2023-04-18/journalist-seeksdismissal-of-lawsuit-over-photos-of-lapd-officers">https://www.latimes.com/california/story/2023-04-18/journalist-seeksdismissal-of-lawsuit-over-photos-of-lapd-officers</a>, April 18, 2023.
- Los Angeles Times: <a href="https://www.latimes.com/california/story/2023-04-06/la-officials-sue-journalistactivist-group-after-accidentally-releasing">https://www.latimes.com/california/story/2023-04-06/la-officials-sue-journalistactivist-group-after-accidentally-releasing</a>, April 6, 2023.
- LAist: \$700,000 Settlement With LAist Reporter Includes Re-Training Of LA Sheriff's Deputies On Press Rights, <a href="https://laist.com/news/criminal-justice/settlement-with-laist-reporter-includesretraining-of-la-sheriffs-deputies-on-press-rights">https://laist.com/news/criminal-justice/settlement-with-laist-reporter-includesretraining-of-la-sheriffs-deputies-on-press-rights</a>, Nov. 8, 2023.
- San Francisco Chronicle: Press rights groups back journalist being sued by L.A. to claw back public records, <a href="https://www.sfchronicle.com/politics/article/los-angeles-police-records18307385.php">https://www.sfchronicle.com/politics/article/los-angeles-police-records18307385.php</a>, Aug. 21, 2023.
- KNBC: City of LA Asks Judge to Stop Spread of LAPD Photos, https://www.nbclosangeles.com/investigations/city-of-la-asks-judge-to-stop-spread-of-lapdphotos/3140915/, April 24, 2023.
- KNBC: Reporter Asks Court to Dismiss LA City Lawsuit Over Police Photo Release, https://www.nbclosangeles.com/investigations/knock-la-reporter-la-city-lawsuit-lapd-police-photorelease/3137104/#:~:text=Lawyers%20representing%20a%20reporter%20being,and%20freed om%2 0of%20the%20press, April 18, 2023.
- Los Angeles Times: Journalist seeks dismissal of lawsuit over photos of police officers, <a href="https://www.latimes.com/california/story/2023-04-18/journalist-seeks-dismissal-of-lawsuit-overphotos-of-lapd-officer">https://www.latimes.com/california/story/2023-04-18/journalist-seeks-dismissal-of-lawsuit-overphotos-of-lapd-officer</a>, April 18, 2023.
- Los Angeles Daily News: Journalist asks court to dismiss lawsuit over released LAPD public records, <a href="https://www.dailynews.com/2023/04/18/journalist-asks-court-to-dismiss-lawsuit-overreleased-lapd-public-records">https://www.dailynews.com/2023/04/18/journalist-asks-court-to-dismiss-lawsuit-overreleased-lapd-public-records</a>, April 18, 2023.
- Los Angeles Times: L.A. sues journalist, activist group to claw back photos of undercover officers, <a href="https://www.latimes.com/california/story/2023-04-06/la-officials-sue-journalist-activist-groupafter-accidentally-releasin">https://www.latimes.com/california/story/2023-04-06/la-officials-sue-journalist-activist-groupafter-accidentally-releasin</a>, April 6, 2023.
- KCRW radio: "Left, Right and Center, All the President's Lawyers," Nov. 19, 2019. Guest on NPR affiliate to discuss First Amendment issues during Trump presidency.
- New York Times, <a href="https://www.nytimes.com/2018/04/02/us/politics/trump-libel-lawsuit.html">https://www.nytimes.com/2018/04/02/us/politics/trump-libel-lawsuit.html</a>, April 2, 2018.
- *Washington Post*: <a href="https://www.washingtonpost.com/blogs/erik-wemple/wp/2016/10/25/is-theamerican-bar-association-really-afraid-of-donald-trump/">https://www.washingtonpost.com/blogs/erik-wemple/wp/2016/10/25/is-theamerican-bar-association-really-afraid-of-donald-trump/</a>, Oct. 25, 2016.

- New York Times: https://www.nytimes.com/2016/10/25/us/politics/donald-trump-lawsuitsamerican-bar-association.html, Oct. 24, 2016.
- KPCC radio: "Why NBC sat on the 'Access Hollywood' Trump tape," John Horn, The Frame, Oct. 10, 2016. Guest on NPR affiliate to discuss about legal issues in releasing Trump's Access Hollywood tapes, <a href="http://www.scpr.org/programs/the-frame/2016/10/10/52620/why-nbc-sat-on-theaccess-hollywood-trump-tape/">http://www.scpr.org/programs/the-frame/2016/10/10/52620/why-nbc-sat-on-theaccess-hollywood-trump-tape/</a>
- KNX radio: Guest on news radio program about Los Angeles Police Department secrecy policy for body cam tapes of police shootings. Oct. 6, 2016.

#### PROFESSIONAL QUALIFICATIONS, MEMBERSHIPS

- Member of the State Bar of California
- Admitted to United States Supreme Court, Ninth Circuit Court of Appeals; United States District Court, Southern, Central, Eastern, and Northern Districts of California
- Los Angeles Copyright Society, Board of Trustees (2015-2016); member (2009-2016)
- 2005 Southern California Rising Stars, Los Angeles Magazine/Law & Politics Magazine
- 2004 Freedom of Information Award, Society for Professional Journalists, Los Angeles Chapter

# **UC IRVINE CLINICAL PRACTICE REPRESENTATIVE CASES Access to Government Records, Court Records, Police Tapes, Police Headshot Photos**

- City of Los Angeles v. Camacho. City of Los Angeles agreed to dismiss its lawsuit against client Ben Camacho, freelance journalist, and pay \$300,000 in attorney's fees to defense counsel team after City wrongfully sued Mr. Camacho for publishing official headshot photographs of Los Angeles Police Department officers, which Mr. Camacho lawfully obtained from the City as part of its settlement of his Public Records Act lawsuit. https://www.fox44news.com/news/national-world-news/ap-los-angeles-will-pay-300000-to-settle-a-lawsuit-against-journalist-over-undercover-police-photos/
- <u>Therolf v. Superior Court</u>, 80 Cal. App. 5th 308 (2022). Won California Court of Appeal decision expanding rights of public to obtain juvenile case files of children killed while under purported protection of juvenile court. Client Garrett Therolf, independent Berkeley journalist, is using records obtained in litigation for planned national news story on failure to social service agencies to protect abused children.
- Knock LA v. County of Los Angeles. Filed successful Public Records Act case against County of Los Angeles, winning disclosure of secret investigation of shooting by Los Angeles County Sheriff's deputy at another deputy, reportedly to shoot off the other deputy's gang tattoo to punish the fellow deputy to altering his tattoo without permission from deputy gang leaders.
- Camacho v. City of Santa Ana. Filed successful California Public Records Act lawsuit against City of Santa Ana, winning disclosure of police body camera footage and other police records. Clinic client Ben Camacho, independent Los Angeles journalist, used records to write April 22, 2022 article for Knock LA revealing that group of Santa Ana police officers formed police gang. Won \$40,000 attorney's fees settlement.
- Knock LA v. County of Los Angeles. Filed successful Public Records Act lawsuit against County of Los Angeles, winning disclosure of records of fatal shootings by Los Angeles Sheriff's Department deputies and concealed weapons permits after being sued by clinic. Client Knock LA, a local nonprofit news organization, sed disclosed records to publish an article about deputy who shot and killed two black men in separate shootings and remains on force without public punishment. Litigation is ongoing to obtain more records.

- Human Rights Defense Center v. County of Los Angeles. Won settlement of California Public Records Act lawsuit requiring Los Angeles County to disclose thousands of pages of lawsuit settlement agreements for over 200 misconduct lawsuits against the Los Angeles Sheriff's Department and Los Angeles County District Attorney's Office. Client Prison Legal News is posting settlement records on its website.
- *Unzueta v. County of Los Angeles*. Won \$90,000 settlement of civil rights lawsuit against County of Los Angeles and Sheriff Alex Villanueva for wrongful arrest, jailing, and strip-searching of client, student photojournalist Pablo Unzueta, by sheriff's deputies on September 8, 2020. Deputies also wrongfully confiscating Pablo's camera, cell phone, and camera memory card.
- Vanessa Marquez Shooting. Won release of internal investigative records from Los Angeles District Attorney's Office and South Pasadena Police Department of fatal police shooting of Stand and Deliver and ER actress Vanessa Marquez during her mental health crisis in her apartment, including extensive body cam footage. Client Cyndy Fujikawa, Los Angeles filmmaker, is using records for planned documentary film.
- "The Trials of Gabriel Fernandez." Filed several successful motions to unseal hundreds of pages of Los Angeles juvenile court records for deceased children Noah Cuatro, Anthony Avalos, Client Garrett Therolf, an independent Berkeley journalist, used records for 2020 co-produced Netflix television documentary series about failure of Los Angeles county child welfare system to protect children from fatal abuse.
- *Katey Rusch*. Won release of dozens of police misconduct records spanning decades in numerous local law enforcement agencies throughout California. Client Katey Rusch, an independent Berkeley journalist, is using records for planned national news report.
- Peltz v. City of Los Angeles. Litigating civil rights lawsuit against City of Los Angeles and Los
  Angeles Police Department Chief Michel Moore for wrongful arrest of Knock LA editor Kate
  Gallagher and reporter Jonathan Peltz who were covering public protest and police eviction of
  homeless encampments from Echo Park Lake. Co-counsel with Pasadena civil rights law firm
  Hadsell Stormer Renick & Dai.
- *People v. Polanski*. Won order by California Court of Appeal requiring Los Angeles Superior Court to unseal transcript of deposition testimony by former prosecutor in child rape case against film director Roman Polanski. Co-counsel with Los Angeles civil rights law firm Schonbrun DeSimone Seplow Harris & Hoffman. Clients are two book authors.
- *People v. Perez.* Won Kern County court order releasing journalist <u>T.J. Esposito</u> from gag order that prevented him from reporting about high-profile criminal prosecution of Latina politician.
- People v. Cuatro, People v. Juarez. Won Los Angeles court order unsealing grand jury transcripts of two parents <a href="mailto:charged">charged</a> with torturing and killing their child. Client Garrett Therolf used records in Netflix docuseries "The Trials of Gabriel Fernandez."
- *Brittany Spears*. Co-authored <u>amicus letter</u> to California Supreme Court urging adoption of rule allowing public and press to watch and/or listen to court hearings via telephone or the internet.

## PRIVATE PRACTICE/ REPRESENTATIVE CASES Access to Government Records, Court Records, Police Tapes

- *People v. Clark*. Won order unsealing police dash cam video of police officer spraying woman with 400-mph pepper spray gun during DUI arrest, causing permanent blindness. Riverside County Superior Court, No RIF1202237 (Oral Order, Sept. 30, 2015)
- *In re Marriage of Burkle*. Won trial court decision striking down as unconstitutional California divorce court secrecy statute, affirmed by appellate court. 135 Cal. App. 4th 1045 (2006) (w/ Kelli Sager)

- Association of Los Angeles Deputy Sheriffs v. Los Angeles County Civil Serv. Comm. Defeated reverse California Public Records Act lawsuit by police union seeking to block disclosure of deputies' disciplinary records. Los Angeles County Superior Court, BC 346082 (2006)
- Copley Press, Inc. v. Sup. Ct. Wrote media amici brief in support of public access to disciplinary hearings for law enforcement officers. 39 Cal. 4th 1272 (2006) (w/ Kelli Sager)
- *Tory v. Cochran*. Wrote media amici brief in support of First Amendment challenge to attorney Johnnie Cochran Jr's gag order against former clients. 544 U.S. 734 (2005) (w/ Kelli Sager)
- Gordon v. FBI. Part of legal team in successful Freedom of Information Act lawsuit compelling FBI and TSA to release documents describing expanded use of "no fly" lists. 388 F. Supp. 2d 1028 (N.D. Cal. 2004); 390 F. Supp. 2d 897 (N.D. Cal. 2005) (w/ Tom Burke and ACLU)
- *People v. Spector*: Won court order unsealing state grand jury transcripts in murder case against record producer Phil Spector. Los Angeles County Superior Court, No. BA 255233, Order, Nov. 10, 2004; Spector's application for review and stay denied, B179294, Order (Cal. Ct. App. Jan. 5, 2005), same, Order (CJ, George) (Cal. Jan. 12, 2005) (*en banc*)
- People v. Polanski. Won motion to unseal state grand jury transcripts more than 25 years after March 24, 1977 statutory rape indictment of movie director Roman Polanski. Los Angeles County Superior Court, No. A334139, Order. (2002)

#### Defamation and Privacy Litigation/Anti-SLAPP Litigation

- Blackman v. Substack, Inc.. Won anti-SLAPP motion in 15-count defamation/privacy case brought by San Francisco tech executive against client, Tech Inquiry, Inc., non-profit news website.
- Prince v. Fox Television Stations. Won dismissal of defamation lawsuit against local Fox TV station for exposing misleading health claims by soft-serve ice cream shop owner. Case No. 107129/2011 (N.Y. App. Div., 1st Dept. March 8, 2016) (w/ Levine Sullivan Koch & Schulz)
- Lehan v. Fox Television Stations. Won first anti-SLAPP motion under District of Columbia's thennew SLAPP statute, winning dismissal of fire department official's defamation lawsuit against local Fox TV station for reporting about his large overtime payments. 2011 WL 11535276 (D.C. Super. Ct. Nov. 30, 2011) (w/ Holland & Knight)
- Stahl v. New World Comm. of Tampa. Won dismissal of defamation and false light lawsuit against local TV station brought by lawyer charged with sex crimes with minors. 22 So.3d 553 (Fla. App. Ct. 2009) (w/ Holland & Knight)
- Meuse v. Fox News Channel. Won dismissal of defamation lawsuit against local Fox TV station (erroneously sued as "Fox News Channel") and America's Most Wanted over report about man wanted by FBI for allegedly kidnapping daughter. 2009 WL 2228865 (Essex County Super. Ct. April 11, 2008) (w/ Brown Rudnick)
- *Chilton v. Center for Biological Diversity, Inc.* Litigated appeal by environmental group of \$500,000 defamation judgment. 148 P.3d 91 (Ariz. App. 2006) (w/ Tom Burke)
- *Seelig v. Infinity Broadcasting Corp.* Co-wrote successful anti-SLAPP motion and appellate brief dismissing defamation lawsuit. 97 Cal. App. 4th 798 (2002) (w/ Fred Mumm and Tom Burke)
- Daly v. Viacom. Co-wrote successful motion to dismiss right of publicity claim. 238 F. Supp. 2d 1118 (N.D. Cal. 2002) (w/ Kelli Sager and Tom Burke)
- Ross v. Santa Barbara News-Press. Assisted trial team; co-wrote motions and appeal of \$2.25 million defamation jury verdict for Beverly Hills mogul in 14-year-long litigation. 2003 WL 22220512 (Cal. Ct. App. Sept. 26, 2003) (w/ Kelli Sager and Gary Bostwick)

#### **Copyright Infringement**

- Newt v Twentieth Century Fox Film Corp. Won motion to dismiss copyright infringement claim against Fox-produced TV series Empire. 2016 WL 4059619 (July 27, 2016) (w/ Caldwell Leslie)
- Feldman v. Twentieth Century Fox Film Corp. Won motion to dismiss copyright infringement lawsuit involving Fox-produced TV series *The Journeyman*. 723 F.Supp.2d 357, 366 (D. Mass. 2010) (w/ Davis Wright Tremaine)
- Brown v. Twentieth Century Fox Home Ent. Won motion to dismiss copyright infringement lawsuit involving Fox-produced horror film Devil's Due. 2015 WL 5081125 (E.D. Ky. Aug. 27, 2015) (w/ Alston & Bird)
- *McKain v. Estate of Rhymer*: Won motion to dismiss copyright infringement lawsuit involving Foxproduced animated films *Rio* and *Rio 2*. 166 F.Supp.3d 197, (D. Conn. April 14, 2015) (w/ Davis Wright Tremaine)
- Muller v. Twentieth Century Fox Film Corp. Won summary judgment in implied contract case involving Fox-produced film Alien v. Predator. 794 F.Supp.2d 429 (S.D.N.Y. March 30, 2011), aff'd 501 F. Appx 81 (2d Cir. 2012) (w/ Bonnie Bogin and Leopold Petrich & Smith)

#### Third-Party Subpoenas/Reporter's Privilege

• Wright v. FBI. Defeated motion to compel reporter's notes in Privacy Act lawsuit against FBI in trial court. 385 F.Supp.2d 1038 (C.D. Cal. 2005), reversed and remanded, 241 Fed.Appx. 367 (9th Cir. 2007).

#### **Pro Bono Activities and Cases**

- Voter observer for Nevada and Arizona Democratic Coordinating Committees, 2008, 2012, 2016
- Fox Group Legal Diversity Committee member. Interviewed and mentored diverse summer law clerks for Fox Diversity Fellowship summer internship program, 2009-2016
- Application of M.B. Won legal permanent residence status for Mexican immigrant under federal Violence Against Women Act (VAWA) (w/ Public Counsel)
- *Jimenez v. Franklin*. Cross-examined government expert in federal civil rights trial of ten Los Angeles County sheriff's deputies; client/jail detainee won \$365,000 jury verdict. 680 F.3d 1096 (9th Cir. 2012) (w/ Emilio Gonzalez and Rory Eastburg)
- Wondries v. Mee Har Tom. Won SLAPP motion and dismissal of libel lawsuit against environmental activist.

#### **AWARDS**

- 2022 Recipient of Los Angeles Press Club Guardian Award for Contributions to and Protection of the First Amendment for work on behalf of journalists at UC Irvine Press Freedom Project
- 2006 Top 75 Women Litigators, Los Angeles Daily Journal
- 2005 Top 75 Women Litigators, Los Angeles Daily Journal