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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

MAURY BLACKMAN, an individual,

Plaintiff,

v.

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.

CASE NO.: CGC-24-618681

REPLY BRIEF IN FURTHER SUPPORT OF MOTION OF DEFENDANTS POULSON, SUBSTACK INC., AND TECH INQUIRY TO RECOVER FEES

Date: July 29, 2025
Time: 9:00 AM
Courtroom: 301
Before: Honorable Christine Van Aken

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

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page(s)

CASES

STATUTES

I. INTRODUCTION

This is not the time or place for Plaintiff Maury Blackman to relitigate the Court's order granting Defendants' anti-SLAPP motions. This is a fee motion, not an appeal, which Mr. Blackman is separately pursuing. The only question for this Court is the amount of attorneys' fees to award Defendants under the anti-SLAPP statute's mandatory fee-shifting provision. (Code Civ. Proc., § 425.16(c)(1).)

Blackman cannot now complain about the high cost of fighting his lawsuit when he drove those costs with his own tactics. He sued four different defendants: Tech Inquiry (a nonprofit organization and website); Substack (the website that hosts the post); journalist Jack Poulson; and Amazon Web Services (a hosting platform that Substack uses).[1] He asserted fifteen separate claims, filed as a "Doe" plaintiff without satisfying the requirements to do so, and sought a TRO on the merits even though the alleged misconduct happened a year before. All of this required significant expenditure by the Defendants. The anti-SLAPP statute holds litigants accountable for filing meritless lawsuits to punish the exercise of First Amendment rights. Blackman must be held accountable, by reimbursing Defendants for the fees they incurred, as required by statute.

Blackman's "no fees" argument is unsupported by law and should be rejected. He argues that undefined "special circumstances" require denial of the motion. (Opp. at 7-8.) Those "special circumstances" are nothing more than an attempt to relitigate whether the First Amendment protected Defendants in this case. It does, and Blackman's argument otherwise has already been rejected. Blackman argues that this was a close case and therefore no fees should be awarded. That is both irrelevant and wholly unsupported by the law.

Despite arguing that this was a close case, Blackman now *denies* that Defendants should have incurred the fees they did. He cites the roughly 40 hours billed by Susan Seager, a solo practitioner hired by the non-profit Tech Inquiry, who largely relied on the evidentiary submissions of its co-defendants, as the outer limit of the time all four defendants should have

[1] As the Court knows, after the Court struck the Complaint in this case, Mr. Blackman sued the City of San Francisco for negligently releasing his arrest record. (Margo Decl. Ex. C.) The City's Anti-SLAPP motion and demurrer are pending in that case.

spent on anti-SLAPP motions.[2] Blackman cannot have it both ways. It cannot be true both that this was a close case in an unexplored area of law, *and* that winning the motions was a trivial matter that should have taken no more than 40 hours.

Blackman then argues the fee award should be reduced or denied altogether because it is unreasonably inflated. This argument should also be rejected. Blackman knew before he filed this lawsuit that Defendants had retained sophisticated law firms to defend against his "eight figure" case. The Motion establishes that the rates charged to Substack, Poulson, and Tech Inquiry are reasonable and that Substack paid less than the rates of comparable firms. And Blackman ignores that ***Amazon Web Services is not requesting its fees and costs***, meaning that he is effectively receiving a large discount from what he owes under the anti-SLAPP statute.

Finally, Blackman quibbles with individual amounts billed, but none of Defendants' fees were duplicative or unnecessary. Blackman's argument that Defendants should not have incurred fees on the Doe Motion or TRO makes no sense. Blackman forced Defendants to incur those fees through his own machinations. His remaining arguments about inefficiency should be rejected. They amount to nothing more than criticisms of how Defendants zealously protected their rights in this case. Defendants respectfully request that the Court award their mandatory fees and costs.

II. ARGUMENT

A. Anti-SLAPP Fee Shifting is Mandatory.

Blackman does not deny that the anti-SLAPP statute requires a mandatory fee award. (Ex. A at 7; Code Civ. Proc., § 425.16(c)(1); *Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1131 ["*any* SLAPP defendant who brings a successful motion to strike is entitled to *mandatory* attorney fees"] [emphasis added].) Instead, he attempts an end-run around the anti-SLAPP statute's mandatory fee-shifting provision, arguing that this case implicates "special circumstances" that would allow him to avoid this mandatory provision. (Opp. at 8.) No such exception exists. Blackman cites *Ketchum*, but the only reference to a "special circumstance" in that case says merely that when a court encounters a "fee request that appears unreasonably

[2] Seager files a supplemental declaration with this reply, confirming that her low hours were made possible by the work of the other co-defendants.

inflated," the court may "reduce the award or deny one altogether." (*Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1137.) *Ketchum* does not hold that a Court may deny fees outright where the anti-SLAPP motion presented novel issues. No case supports that proposition.

Blackman next looks to *Farris v. Cox* (N.D.Cal. 1981) 508 F.Supp. 222, 226, to justify a flat denial of all fees. (Opp. at 8.) There, the court denied fees for time preparing a fees motion, which were sought under a *discretionary* fee-shifting statute. (42 U.S.C. § 1988.) *Farris* is plainly inapposite. His other case, *Serrano v. Unruh* (1982) 32 Cal.3d 621, 635, is also a case decided under a *discretionary* statute different from the anti-SLAPP statute. (Code Civ. Proc., § 1021.5.) *Serrano* sought to "discourage greed" by plaintiffs filing repeat actions seeking unreasonable fees. (*Serrano*, 32 Cal.3d at 635.) That logic does not apply to Defendants.

Blackman also protests that he did not bring his SLAPP suit for an "improper purpose." (Opp. at 5.) But Blackman's purpose is irrelevant. Section 425.16 requires a mandatory award of fees to prevailing defendants even if the action was not improperly motivated. (See *Vargas v. City of Salinas* (2011) 200 Cal.App.4th 1331, 1348 [rejecting argument that defendants prevailing on an anti-SLAPP need show "that the suit was objectively baseless or improperly motivated before … [they] could recover … attorney fees"].) The only remaining question is the amount of the fees.

B. Defendants May Recover Reasonable Fees for the Entire Action.

Blackman misstates the fundamental rule regarding the recovery of fees under § 425.16(c) by seeking to exclude all fees beyond Defendants' anti-SLAPP motions, including: (1) the demurrer (which he mistakenly refers to as the "answer" (Opp. at 11; Sanghvi Decl. Ex. 5)); (2) his TRO; (3) his motion to proceed as a "Doe" plaintiff; and (4) the parties' motions to seal.

Those fees are recoverable. Under the "inextricably intertwined" standard, Defendants may recover fees on all work in the matter that involved issues of law and fact common to the anti-SLAPP motion. (See *Kearney v. Foley & Lardner* (S.D.Cal. 2008) 553 F.Supp.2d 1178, 1183-84.) Where, as here, "*all* of plaintiffs' case was dismissed pursuant to section 425.16," fees are broadly recoverable because they are inextricably intertwined with the motion to strike. (*Vargas*, 200 Cal.App.4th 1331, 1351 [emphasis added]; cf. *569 East County Boulevard LLC v.*

Backcountry Against the Dump, Inc. (2016) 6 Cal.App.5th 426, 429 [permitting narrower recovery of fees where an anti-SLAPP motion struck only one claim against one defendant in "an action against numerous entities and individuals"].)

Blackman relies on *Lafayette Morehouse, Inc. v. Chronicle Publishing Co.* to argue that a prevailing defendant is not entitled to fees and costs incurred for the entire action. (Opp. at 10 [citing *Lafayette* (1995) 39 Cal.App.4th 1379].) But that case was superseded by statute in 1997. (*Maxwell v. Kaylor* (N.D.Cal., Apr. 29, 2022, No. 18-cv-06121-NC) 2022 U.S. Dist. LEXIS 142090, at *5 ["Maxwell argues that under [*Lafayette*], the fee award should be limited only to fees incurred in bringing the anti-SLAPP motion. However, this holding … was later superseded by statute"].) Likewise, *569 E. County*, 6 Cal.App.5th at 429, is distinguishable. That case involved an anti-SLAPP that successfully struck only one claim against one defendant in "an action against numerous entities and individuals." (*Ibid*.) But California courts have awarded fees for the entire case when "granting the special motion to strike effectively dismissed *all* of plaintiffs' claims." (*Zwebner v. Coughlin* (S.D.Cal., Jan. 25, 2006, No. 05CV1263 JAH(AJB)) 2006 U.S. Dist. LEXIS 104701, at *4 [emphasis added].) Finally, Blackman's citation to *Wanland v. Law Offices of Mastagni, Holstedt & Chiurazzi* (2006) 141 Cal.App.4th 15, 22, contradicts his position. There, the court allowed Defendant to recover fees and costs incurred beyond the anti-SLAPP motion, reasoning that otherwise, "the protection provided to a defendant who is brought into court for exercising free speech and petition rights would be compromised." (*Ibid.*) For that very reason, Defendants here should be granted their pre-anti-SLAPP fees and costs.

The demurrer, Doe Motion, TRO, and motions to seal all share issues of law and fact common to the anti-SLAPP motion. They are "inextricably intertwined" with the anti-SLAPP motion. (Opp. Br. at 14-15; infra p. 7.) The associated fees are thus recoverable under § 425.16. (See *Kearney*, 553 F.Supp.2d at 1183-84.)

C. Defendants' Fee Requests Are Reasonable.

Blackman is being asked to pay $734,723.36 in attorneys' fees and costs—not "nearly $1 million," as he claims (Opp. at 5)—for the hours that Defendants reasonably spent "extricating"

their clients from his "baseless lawsuit." (See *Wilkerson v. Sullivan* (2002) 99 Cal.App.4th 443, 446.) This is reasonable under the circumstances. Blackman litigated this case aggressively. He dragged four separate defendants into court. (Opening Br. at 10.) He enlisted the City of San Francisco's Attorney's Office to threaten enforcement actions against Defendants. (Ex. B at 3-4.) He alleged *fifteen* claims, all of which "lacked even minimal merit." (Ex. A at 7.) Blackman complains Defendants' attorneys should not have spent additional time because "each claim arose from the same conduct." (Opp. at 10.) That is wrong. Though Blackman's group pleading glosses over these differences, Poulson engaged in journalistic activities; Tech Inquiry and Substack maintained platforms and declined to remove Poulson's journalism; and AWS provided back-end services. Blackman also threatened that once he sued, this would become an "8 figure" lawsuit, meaning that damages would be in the tens of millions of dollars. (Baskin Decl. ¶ 8.) What Defendants seek to recover is a small fraction of that.

Blackman also drove up costs with unnecessary motions. He improperly sued as a "John Doe," triggering a costly round of briefing. (Opening Br. at 11-12.) Though he waited over a year to sue, he then filed an *ex parte* application for a TRO. (Opening Br. at 12.) This forced Defendants into overnight briefing on the merits of the case. (*Ibid*.) It is incorrect that the TRO motion was "never even heard or decided." (Opp. at 12.) It was denied because Blackman did not follow procedure, underscoring the fact that he ran up the bill on futile motions.

Likewise, Blackman's filing of a Doe complaint required defendants to file extensively redacted versions of the anti-SLAPP papers—even for information that had already become public—and forced Defendants to undertake the time-consuming process of drafting sealing papers on multiple motions. (See *Six4Three, LLC v. Facebook, Inc.* (2025) 109 Cal.App.5th 635, 660-61 [including defendant's sealing motions as "expenses incurred *in extracting* [defendants] from a baseless lawsuit"].) And contrary to Blackman's assertions, Poulson's motion to seal succeeded. Blackman cannot now "be heard to complain about the time [Defendants] necessarily spent" responding to his tactics. (See *Peak-Las Positas Partners v. Bollag* (2009) 172 Cal.App.4th 101, 114.)

Blackman claims that "Defendants cannot point to one solitary case where a court has granted comparable fees," but this simply ignores Defendants' opening brief. (Opp. at 8-9.) Courts routinely award comparable fee awards under California's anti-SLAPP statute. (See, e.g., *Six4Three*, 109 Cal.App.5th at 661 [affirming the award of $683,417 in fees]; *Resolute Forest Prods, Inc. v. Greenpeace Int'l* (N.D.Cal., Apr. 22, 2020, No. 17-cv-02824-JST) 2020 WL 8877818, at *4 [awarding $545,572.36 *five years ago*]; *Wynn v. Chanos* (N.D.Cal., June 19, 2015, No. 14-cv-04329-WHO) 2015 WL 3832561, at *6 [awarding $390,149.63 in attorneys' fees *ten years ago*].)

D. Substack's Counsels' Hourly Rates Are Reasonable.

Blackman challenges only Substack's hourly rates. But they were reasonable. Substack presented ample evidence of this, including evidence of courts approving rates similar to Substack's for anti-SLAPP motions, which Blackman also ignores. (Opening Br. at 15-16.)

The thrust of Blackman's attack is that the PWC survey should be rejected because the motion did not provide the survey data. But Blackman's own authority supports Substack's approach. (See *Open Source Sec., Inc. v. Perens* (N.D.Cal., June 9, 2018, No. 17-cv-04002-LB) 2018 WL 2762637, at *3 [approving of "declarations by O'Melveny lawyers," that "contextualized their rates by reference to market-research data"], affd. (9th Cir. 2020) 803 F.App'x 73.) Blackman tries to exclude that evidence because it devastates his position; per the PWC survey, ***the rates charged by Wilson Sonsini are less than comparable firms***.

Blackman next argues that *Riley v. Quantumscape Corp.* (N.D.Cal., Aug. 15, 2023, No. 22-cv-03871-BLF) 2023 U.S. Dist. LEXIS 142765, at *12, should lead the court to benchmark Substack's junior partners and senior counsel at $600 per hour. (Opp. at 17-18 & n.11.) That does not comport with the record of what constitutes a reasonable fee here. Blackman ***concedes*** that for senior counsel for Poulson and Tech Inquiry, hourly rates exceeding $900 an hour are reasonable. (Opp. at 17 & n.11.) Regardless, *Riley* is distinguishable. There, the Court was concerned that there was not enough specificity supporting the requested rates. (2023 U.S. Dist. LEXIS 142765.) By contrast, Substack has provided specific PWC data reflecting the median rates of litigators in non-intellectual property matters at AmLaw 50 firms in the San Francisco

and Silicon Valley markets. The AmLaw 50 is not a random group of law firms; it is a commonly referenced list of the 50 largest law firms in the United States as measured by revenue. (Baskin Decl. ¶ 3 n.1.) The median rate among similar-sized law firms in the same market for the same type of matters is a sensible metric to assess reasonable rates in this case. PWC provides clients with other benchmarks by which to assess the reasonableness of rates; Substack's rates fell well below those as well. (Margo Decl. ¶¶ 2-3.)

E. Defense Counsels' Hours Worked Are Reasonable.

The hours worked were "reasonable under the circumstances." (See *Premier Med. Mgmt. Sys., Inc. v. Cal. Ins. Guarantee Ass'n* (2008) 163 Cal.App.4th at 561; see also *id*. at 560 [affirming an award for fees to two firms who collectively billed "more than 345 hours" on an anti-SLAPP motion and explicitly declining to adopt a 50-hour limit for fees].) Without authority, Blackman argues that Defendants should have filed only one joint anti-SLAPP motion. They were not required to, especially given that all four defendants had distinct roles on the material facts. Nevertheless, where Defendants could collaborate to minimize costs, they did. (Supp. Seager Decl. ¶ 2.) Blackman next complains about individual time entries. Defendants respond in turn:

i. Substack's Hours Worked Are Reasonable.

Substack staffed its defense team in a strategic and cost-effective manner. Substack billed less than an hour of time for its most senior partner's advice, provided only at the outset of the case. (Ex. J.) Baskin, who was a partner for the duration of the case, billed only 32.5 hours. And of the 157.6 hours Wakefield billed to this matter, 143.8 of them were billed when he was serving as Of Counsel, before becoming partner on February 1, 2025. (Opening Br. at 17; Baskin Decl. ¶ 3 n.2.) Any suggestion that Wakefield performed an excessive amount of work *for a partner* is based on a false premise. (See Opp. at 15-16.) Blackman also challenges WSGR's decision to staff two law clerks (junior associates not yet admitted to the bar) as inefficient; however, excepting the instant brief, only one law clerk worked on this matter at a time. (Margo Decl. ¶ 4.) WSGR's staffing structure here is typical among large law firms: 9% of hours were

billed by partners, 48% by counsel (equivalent to senior associates in this case, as there were none), 37% by junior associates, and 6% by paralegals.[3]

Blackman's other complaints (Opp. at 11-12) are meritless:

1. $7,417.37 of legal work responding to Blackman's pre-suit demand letters. All of this concerned either efforts to avoid a lawsuit or work developing the defenses Substack would later use in its anti-SLAPP motion and demurrer. (Margo Decl. ¶ 5.)

2. $39,616.55 for "Case Management." At least $28,951.66 of that amount related to research, writing, and strategy, including coordination with co-defendants on legal issues. The remainder were attributable to activities integral to resolving this dispute, like negotiating service of the complaint or stipulating a briefing schedule. (Margo Decl. ¶ 6.)

3. $24,249.70 for an "answer/CMC." Substack never filed an answer in this case, and only $1,888.69 of this amount was associated with the Case Management Statement. The remainder of this work was legal research and strategy, primarily for a demurrer that addressed the same issues as the anti-SLAPP motion and was reasonably necessary to preserve its rights. (See *Wilbanks v. Wolk* (2004) 121 Cal.App.4th 883, 905 [holding that an anti-SLAPP motion is not a substitute for a demurrer or summary judgment motion].)

4. $89,469.56 for opposing Blackman's motion to proceed as a Doe Defendant, which touched on the same merits issues at issue in the anti-SLAPP motion. If Defendants had not challenged that motion, they would have been acceding to the idea that Blackman was entitled to anonymity, which was Blackman's entire (and incorrect) point in the lawsuit.

5. $31,583.11 for opposing Blackman's motion for a Temporary Restraining Order, which required briefing on the merits of the case.

6. $10,676.72 on opposing motions to seal, which were required because Blackman insisted on redacting information that was already public.

[3] Blackman complains that Substack's defense involved more hours than those expended by Seager, a solo practitioner representing a small nonprofit. (Opp. at 9.) But Ms. Seager's hours were lower because she benefitted from the co-defendants' work (Supp. Seager Decl. ¶¶ 2-3.)

7. $14,428.89 trying to get an appellate case published. The time was spent on an application to the Court of Appeal requesting publication of *Nelson v. Bridgers*, which would have supported an additional argument that Poulson's articles addressed a matter of public interest; *i.e.*, because Blackman is a powerful industry figure suspected of abusing a woman. (See Margo Decl. Exs. A-B.) This was directly related to the anti-SLAPP motion.

8. $12,920.30 for computer research costs.[4] California courts have permitted recovery of the costs of computerized legal research. (See, e.g., *Plumbers & Steamfitters, Local 290 v. Duncan* (2007) 157 Cal.App.4th 1083, 1099.) All the legal research are compensable. (Margo Decl. ¶ 11.)

ii. Poulson's Hours Worked Are Reasonable.

The hours incurred by Electronic Frontier Foundation on behalf of Poulson were also reasonable. As is typical in such cases, Greene, an experienced attorney, supervised Noble, a less experienced attorney who took the lead on the fact development, legal research, drafting, redactions, and coordinating with legal support services. While it might have taken Greene fewer hours had he done all of the work himself, he also bears a fee rate almost three times that of Noble. Blackman's only specific complaint is that Noble spent too many hours on the anti-SLAPP motion. But he does not take issue with any particular time entry.

To the contrary, Noble's time was well spent and appropriate. To provide the zealous representation Poulson deserved, she had to research recent developments in anti-SLAPP law, his various First Amendment defenses, and the substance of the fourteen different claims pled against Poulson, most of which involved statutes EFF had not previously litigated. She had to marshal Poulson's facts, which were far more extensive than any other defendant, review his extensive reporting, and analyze how the relevant law applied to these facts. She had to carefully draft both the anti-SLAPP motion and the reply, briefs on a dispositive motion that deserved careful attention. She also argued the anti-SLAPP motion and prepared for argument. Her time also includes work on the motions to seal and TRO.

[4] Substack withdraws its requests for costs related to Deposition Transcripts and Miscellaneous Costs.

iii. Tech Inquiry's Hours Worked Are Reasonable

Blackman does not dispute the reasonableness of Seager's $950 hourly billing rate or hours spent on Tech Inquiry's anti-SLAPP motion. His only challenge is to Seager's 4.4 hours ($4,180) for work on the TRO; 16.1 hours ($15,295) opposing Blackman's motions to seal his felony domestic abuse arrest record and articles; and 0.6 hours ($570) opposing Blackman's notice of an allegedly related case in federal court, for a total of 21.1 hours ($20,045). Blackman does not provide a basis for disputing these hours, but presumably he is relying on his argument elsewhere in his brief that defense counsel should only be awarded for fees spent on the anti-SLAPP motion. But Seager's work opposing Blackman's application for an unconstitutional prior restraint in the form of a TRO required opposing Blackman's motions to seal his arrest record and articles already in the public domain; and opposing Blackman's notice of an allegedly related case in federal court were all 'inextricably intertwined' with Seager's anti-SLAPP motion because all shared common legal issues and facts: that Blackman's felony domestic abuse record and articles about his arrest were already in the public domain; a restraining order requiring Defendants to remove them from the internet would violate the First Amendment; and tort claims based on the publication of a lawfully obtained government record are barred by the fair report privilege and the First Amendment. [5]

III. CONCLUSION

Defendants respectfully request that this Court grant this Motion, awarding attorneys' fees and costs of $157,425.75 for Mr. Poulson; $516,477.61 for Substack; and $60,820.00 for Tech Inquiry, in addition to any fees incurred in preparing the Reply and arguing the Motion.

[5] Blackman contends in a footnote that Tech Inquiry and Poulson should not be awarded any attorney's fees or costs because Tech Inquiry's anti-SLAPP motion erroneously stated in the Facts section that "Plaintiff failed to prevent the deaths of 19 Premise Data employees," which Blackman contends was "knowingly false and malicious." (Opp. at 7 n.5.) But Blackman omits key facts. As Blackman's counsel is fully aware, Seager learned of error in Tech Inquiry's anti-SLAPP motion, informed Blackman's counsel, David Marek, that it was a mistake, and filed a Corrected Amended anti-SLAPP motion correcting the mistake, which was not dispositive to the anti-SLAPP motion. A corrected non-dispositive factual mistake in an anti-SLAPP motion is not a basis to deny an award of attorneys' fees, and Blackman cites no supporting authorities.

Dated: July 22, 2025

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