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**UNITED STATES DISTRICT COURT
FOR THE NOTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CHEVRON CORP.,

Plaintiff,

v.

STEVEN DONZIGER, *et al.*

Defendants.

) Case No. 3:12-mc-80237 CRB (NC)

) **SUPPLEMENTAL DECLARATION OF**
) **MICHELLE HARRISON IN SUPPORT OF**
) **MOTION OF NON-PARTY MOVANTS TO**
) **QUASH SUBPOENAS TO GOOGLE, INC.**
) **AND YAHOO! INC. SEEKING IDENTITY**
) **AND EMAIL USAGE INFORMATION**

) Date: January 16, 2013
) Time: 1:00 PM
) Place: Courtroom A - 15th Floor
) Hon. Nathanael Cousins

1 1. I, Michelle Harrison, have personal knowledge of all matters set forth in this
2 declaration. If called upon to do so, I could and would testify to all matters set forth herein.

3 2. I am a law clerk with EarthRights International, counsel of record for Non-Party
4 John Doe Movants.

5 3. EarthRights International and the Electronic Frontier Foundation represent the
6 owners of the following email accounts: cortelyou@gmail.com, sayjay80@gmail.com,
7 kevincoenigquito@gmail.com, marialya@gmail.com, coldmtn@gmail.com, figer@gmail.com,
8 bandawatch@gmail.com, catmongeon@gmail.com, briansethparker@gmail.com,
9 lupitadeheredia@gmail.com, josephmutti@gmail.com, drewwoods3@gmail.com,
10 katiachgomez@gmail.com, tegelsimeon@gmail.com, lara_garr@gmail.com,
11 richard.clapp@gmail.com, ampage@gmail.com, goldstein.ben@gmail.com,
12 wilsonaguinda@gmail.com, sara.colon@gmail.com, farihahzaman@gmail.com,
13 jeremylow@gmail.com and courtneyrwong@gmail.com, jenbilbao3@yahoo.com,
14 kshuk22@yahoo.com, erikmoe66@yahoo.com, drewwoods3@yahoo.com,
15 lupitadeheredia@yahoo.com, and Lore_gamboa@yahoo.es. We also represent the owners of the
16 following Microsoft email account addresses for the purpose of a separate motion to quash filed in
17 the Northern District of New York: simeontegel@hotmail.com, mey_1802@hotmail.com, and
18 lupitadeheredia@hotmail.com.


19 4. In addition to the anonymous Non-Party Movants, EarthRights International and the
20 Electronic Frontier Foundation also represent non-parties John Rodgers and Laura Belanger, the
21 owners of the email accounts rogers.john@gmail.com and belanger.laura@gmail.com.

22 5. EarthRights International and the Electronic Frontier Foundation now also represent
23 the owner of the email address hueyzaclan@gmail.com. This account user joined the Non-Party
24 Movants motion to quash on January 7, 2013.

25 6. I contacted a number of the email addresses listed in Chevron's subpoenas. In
26 response, some of these email addresses sent messages back informing me that the message could
27 not be delivered, indicating these addresses are no longer in use or no longer functional for other

1 reasons. These addresses include Fpenafiel1100@yahoo.com, kshuk22@yahoo.com,
2 sandragrimaldi12@yahoo.com, and ruben.miranda@rocketmail.com.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct. Executed on January 9, 2013.

5
6 A handwritten signature in dark ink, appearing to read "Michelle C. Harrison", is written over a light blue horizontal line.

7
8 MICHELLE C. HARRISON