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Attorneys for Plaintiff Perfect 10, Inc.

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA

11 PERFECT 10, INC., a California
12 corporation,

13 Plaintiff,

14 v.

15 GOOGLE INC., a corporation; and
16 DOES 1 through 100, inclusive,

17 Defendants.

18
19 AND CONSOLIDATED CASE

Master Case No.: 04-9484 AHM (SHx)

DECLARATION OF IRINA
VORONINA SUBMITTED IN
SUPPORT OF MOTION FOR ORDER
GRANTING LEAVE TO FILE
SECOND AMENDED COMPLAINT

[REPLY BRIEF IN SUPPORT OF
MOTION FOR ORDER GRANTING
LEAVE TO FILE SECOND
AMENDED COMPLAINT; AND
REPLY DECLARATIONS OF
JEFFREY N. MAUSNER AND DR.
NORMAN ZADA IN SUPPORT
THEREOF, SUBMITTED
CONCURRENTLY HEREWITH]

Date: July 14, 2008
Time: 10:00 a.m.
Place: Courtroom 14, Courtroom of the
Honorable A. Howard Matz

Discovery Cut-Off Date: None Set
Pretrial Conference Date: None Set
Trial Date: None Set

1 I, Irina Voronina, declare as follows:

2 1. I am a model and actress, and am married. I was photographed by Perfect
3 10 in 1998 and then later by Playboy. Playboy made me their 2001 Playboy playmate
4 of the month. I am a former Elite model and I am currently with Wilhemina Models. I
5 recently appeared in the movie Reno 911!:Miami and am a series regular in the
6 Cartoon Network show, Saul of the Molemen. I do quite a bit of print and commercial
7 work, for such companies as JC Penney, Rampage, Kohls, Carls Junior, Budweiser,
8 Saint Pauli Girl, Orkin, Skyy Vodka, Bacardi, and many others .

9 2. I am proud of my body and do not have a problem being photographed
10 nude, as long as the images are tasteful. I believe that the photos of me that appeared
11 in Perfect 10 and Playboy are tasteful.

12 3. I never expected that Google and other search engines would copy my
13 Perfect 10 pictures without permission and make them available to hundreds of
14 millions of users. And I certainly never expected that Google and the other search
15 engines would allow their image search results on my name to falsely portray me as
16 being engaged in explicit sexual acts, or to falsely suggest that I am a porn star or a
17 prostitute. Google and other search engines have damaged me to the point where on
18 IMDB, the index frequently consulted for reliable information on actresses, there is a
19 discussion of whether or not I am a porn star. Google allows searches not only on my
20 name, but also on my name combined with terms like "pornstar," "escort," "sex," and
21 "prostitute." These searches lead to very explicit images involving my name that are
22 infuriating me and could easily ruin my career. For example, on the first page of
23 Google Image Search results on "Irina Voronina" pornstar, and on the 11th page of
24 Google Image Search results on my name, there is a picture of a blond girl giving oral
25 sex, with my name, Irina Voronina, below the picture. That is not a picture of me,
26 even though it shows up on a Google Image Search of my name. There are real
27 pictures of me, that Google uses without my permission, on the same page and on the
28 other pages of the Google Image Search. Hollywood producers and directors, and

1 other people looking at the picture of the blond girl giving oral sex, would think it was
2 me. For the Google Image search "Irina Voronina" escort, the very first image of me
3 is from the website escortsex.cz, where I am falsely portrayed to be an escort.
4 Escortsex.cz does not have permission to use any picture of me, and Google does not
5 have permission to copy those pictures and post them on Google's website, indicating
6 that I am an escort. On page 40 of Google Image search results on my name, there are
7 two pictures of a blonde girl having intercourse with one man and giving another man
8 oral sex. Again, that is not a picture of me, even though it shows up on a Google
9 Image Search of my name, with real pictures of me. The website is called
10 explaymates.com, which does not have permission to use any of my pictures. Once
11 again, people could think that was me.

12 4. I do not want Google to show any image of me or to use my name in any
13 way that falsely suggests that I have been filmed performing explicit sexual acts, or
14 that I am a porn star or a prostitute. I am trying very hard to become a successful
15 actress and such actions by Google can ruin my career and I suspect have already
16 damaged it a lot. I do not want my friends, business associates, or family members to
17 falsely believe that I am a prostitute or a porn star.

18 5. I assigned my rights of publicity to Perfect 10 in the hope that Perfect 10
19 could stop Google from destroying my reputation by using my name and images, and
20 make money from doing it, without any concern for my reputation or my rights, and
21 without my permission. I do not have the resources to sue Google myself. Perfect 10
22 also paid me for the assignment of rights.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct to the best of my knowledge.

25 Executed on September 20, 2007, at Los Angeles, California.

26
27 

28 Irina Voronina