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 BLIZZARD ENTERTAINMENT, INC.
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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
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13 BLIZZARD ENTERTAINMENT,
 INC.,
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15 Plaintiff,

16 vs.

17 ALYSON REEVES, D/B/A
 SCAPEGAMING, and DOES 1
 18 through 5 inclusive,
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Defendants.
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Case No. 2:09-cv-7621-SVW-AJW

DECLARATION OF BONNIE LAU
 IN SUPPORT OF PLAINTIFF
 BLIZZARD ENTERTAINMENT,
 INC.'S MOTION FOR ENTRY OF
 DEFAULT JUDGMENT AND
 PERMANENT INJUNCTION

SONNENSCHN NATH & ROSENTHAL LLP
 601 SOUTH FIGUEROA STREET, SUITE 2500
 LOS ANGELES, CALIFORNIA 90017-5704
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DECLARATION OF BONNIE LAU

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2 1. I am an attorney duly licensed to practice in the State of California and
3 before the Federal District Court for the Central District of California. I am an
4 attorney at Sonnenschein Nath & Rosenthal LLP, counsel of record for plaintiff
5 Blizzard Entertainment, Inc. (“Blizzard”). I have personal knowledge of the
6 matters set forth in this declaration and if called as a witness, I could and would
7 testify competently thereto.

8 2. I am informed and believe that, based on records subpoenaed from
9 PayPal Inc., between July 22, 2007 and September 26, 2009, Defendant
10 Alyson Reeves, d/b/a Scapegaming (“Defendant”), conducted approximately
11 104,431 transactions and received approximately **\$3,052,339** from players’
12 “donations” and “Shopping Cart” transactions through scapegaming.com. Of
13 those totals, 103,380 transactions and \$3,036,273 were from “Shopping Cart”
14 transactions, while 581 transactions and \$16,126 were from “donations.”

15 3. Blizzard has been forced to incur attorneys’ fees and costs in the
16 investigation and prosecution of this action. Pursuant to Central District Local Rule
17 55-3, for judgments greater than \$100,000, attorneys’ fees are fixed at “\$5600
18 plus 2% of the amount over \$100,000.” Assuming a judgment of at least
19 \$3,000,000, the amount of reasonable fees would be fixed by Local Rule 55-3 in
20 the amount of \$63,600.

21 4. Blizzard filed the Complaint in this action on October 20, 2009.
22 Blizzard served the Summons and Complaint on Defendant on November 4, 2009,
23 and filed the Proof of Service with this Court on January 11, 2010.

24 5. Following service, Defendant never appeared or responded to the
25 complaint.

26 6. Blizzard filed a request for entry of default on January 11, 2010,
27 attached to which as Exhibit A was a copy of the Proof of Service.
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7. The Clerk of the Court entered default against Defendant on January 14, 2010. Attached as Exhibit A is a true and correct copy of the certificate of the Clerk of this Court as to the entry of default.

8. I am informed and believe that Defendant Alyson Reeves is not a minor, incompetent, in military service, or otherwise exempted from default judgment under the Soldiers’ and Sailors’ Civil Relief Act of 1940.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 18th day of June 2010 at San Francisco, California.

Bonnie Lau /s/
BONNIE LAU

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