

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

DOE I, and DOE II,

Plaintiffs,

v.

Individuals, whose true names are unknown,

Defendants.

Case No. 3:07CV00909 (CFD)

Date: March 17, 2007

**DECLARATION OF DOE II IN SUPPORT OF PLAINTIFFS' OPPOSITION TO JOHN
DOE 21'S MOTION TO QUASH PLAINTIFFS' SUBPOENA¹**

I, DOE II, declare as follows:

1. I am a plaintiff in this action. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, could do so competently under oath.

2. After I learned that someone using the moniker "AK47" posted messages about me on AutoAdmit stating that "Women named Jill and [DOE II] should be raped" and that I was AK47's "gay lover"—which is false—I was upset and humiliated. But more importantly, after already enduring months of harassment, threats and defamatory attacks on AutoAdmit, I was scared for my safety. I knew that AK47 was a notorious poster on AutoAdmit.com, that he often used racial slurs on the message board, and that he had developed a following of other AutoAdmit posters who seemed to enjoy and encourage his vitriolic rants. Knowing that someone like AK47 was suggesting that I should be raped made me feel frightened and ill. As a result of the threats and harassment that I experienced on AutoAdmit, including the statements

¹ The exhibits attached to this declaration, as well as the statements in this declaration taken from those exhibits, have been redacted to replace my name with DOE II, in accordance with this Court's Order of June 18, 2007 granting Plaintiffs' motion to proceed anonymously.

posted by AK47, it became increasingly difficult for me to sleep at night, and I often stayed with friends or had friends escort me home because I did not feel comfortable being alone in my apartment.

3. The extreme emotional distress that I suffered and continue to suffer from the defendants' defamation, threats and harassment—including that inflicted by AK47—includes depression, stress, fearful feelings, and anxiety. In addition, I also experienced and continue to experience frequent insomnia, loss of appetite, and stomach problems.

4. The severe emotional distress that I experienced forced me to seek medical treatment. In September 2007—after enduring months of attacks on AutoAdmit, including AK47's statement that I should be raped and false statement we were "gay lovers"—I started taking medication to treat anxiety and depression directly resulting from the harassment I was experiencing. Presently, I still see a therapist and take medication to help with the emotional distress from which I continue to suffer.

5. The stress and anxiety that I experienced as a result of the defamation, threats and harassment aimed at me on AutoAdmit, including by defendant AK47, affected my relationships with my family, friends, classmates, and colleagues. For example, long ago my paternal aunt set up a "Google alert" for my name, so that she would receive an email each time a new thread appeared about me on that search engine. When she discovered that negative content about me from AutoAdmit was accruing on Google she experienced anxiety and depression. Because my father and aunt are Muslim, false statements made about my sexual behavior, as well as other sexually harassing comments about my body and the desire to assault me, are particularly damaging to my relationship with them. Since the onset of the postings, my father and aunt do not speak to me as often as they used to, and our relationship is distant and strained.

6. The depression and anxiety that I experienced as a result of the defendants' comments on Autoadmit, including AK47's messages, also have affected my other inter-personal relationships. I have become largely withdrawn from the social activity of the law school. I no longer regularly attend my classmates' social functions because I feel uncomfortable with the

possibility that other attendees may be or know the identities of anonymous posters. I am no longer social and enthusiastic upon meeting new people because of the fear that they will do an Internet search of my name and read the horrible things that have been written about me. As a result, I avoid giving my full name and email address to people that do not already have it, which makes it particularly difficult to make new friends.

7. Similarly, I have had difficulty dating and becoming involved in romantic relationships since the negative threads began to appear about me on AutoAdmit, including the messages posted by AK47. I feel suspicious of men in general now, and have even ended some of my platonic relationships with male friends because of my newfound discomfort around most members of the opposite sex.

8. During the fall 2007 interview process at Yale, I feared that potential employers would read disparaging comments about me on AutoAdmit, including the messages posted by AK47 that I “should be raped” and that I was AK47’s “gay lover.” In three interviews, I found it necessary to disclose the fact that I had been targeted by pseudonymous posters online, and I only received a call-back for further interviews from one of those firms.

9. I was deeply offended, mentally distressed and frightened by the invasion of my privacy and the publication of false information about me on the AutoAdmit website. I was equally offended and distressed by the publication of information about me that I believe placed me in a false light.

10. As a result of the defendants’ threatening, defamatory and offensive conduct, I suffered damages, including but not limited to costs of medical treatment and other costs and expenses.

11. Attached hereto as **Exhibit A** is a true and correct copy of the thread “Alex Atkind, Stephen Reynolds, [DOE II], and me: GAY LOVERS,” posted on AutoAdmit by “AK47” on March 30, 2007.

12. Attached hereto as **Exhibit B** is a true and correct copy of pages from the thread “Blacks have genetically low IQs. Thus AA is a waste of time,” posted on AutoAdmit by “AK47” on December 17, 2006.
13. Attached hereto as **Exhibit C** is a true and correct copy of a message post by AK47 on AutoAdmit on June 25, 2007, within a thread entitled “Blind grading is a racist...” and dated May 18, 2004.
14. Attached hereto as **Exhibit D** is a true and correct copy of the post “MEXICANS: go back to you’re country,” posted on AutoAdmit by “AK47” on May 25, 2007.
15. Attached hereto as **Exhibit E** is a true and correct copy of the thread “Anyone else happy that AK47 was added as a defendant?” posted on AutoAdmit by “Donald Anselmi” on November 9, 2007.
16. Attached hereto as **Exhibit F** is a true and correct copy of pages from the thread “Possible malicious prosecution claims against David Rosen,” posted on AutoAdmit by “AK47” on June 12, 2007.
17. Attached hereto as **Exhibit G** is a true and correct copy of the thread “So are we allowed to use [DOE II]’s name in threads anymore,” posted on AutoAdmit by “AK47” on June 12, 2007.
18. Attached hereto as **Exhibit H** is a true and correct copy of the post “Women named Jill and [DOE II] should be raped,” posted on AutoAdmit by “AK47” on June 17, 2007.
19. Attached hereto as **Exhibit I** is a true and correct copy of the post “How many cocks did [DOE II] suck for this?” posted on AutoAdmit by “:D” on March 4, 2007.
20. Attached hereto as **Exhibit J** is a true and correct copy of the post “PSA: LISTEN TO CGWBT [DOE II]’S MESSAGE FOR YOU NOW,” posted on AutoAdmit by “playboytroll” on April 9, 2007.
21. Attached hereto as **Exhibit K** is a true and correct copy of the post “[DOE II] the CGWBT sucked my cock for an P in Civ pro,” posted on AutoAdmit by “Dean_Harold_Koh” on April 10, 2007.

