

Slade R. Metcalf (SM 8360)
Jason P. Conti (JC 0581)
Rachel F. Strom (RS 9666)
Hogan & Hartson LLP
875 Third Avenue
New York, NY 10022
Telephone: (212) 918-3000
Facsimile: (212) 918-3100

*Attorneys for Defendants Twentieth Century Fox
Film Corporation, One America Productions, Inc.,
Todd Schulman, and Sacha Baron Cohen*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
MICHAEL PSENICKSKA,	:	
	:	
Plaintiff,	:	Case No.: 07 CIV 10972 (LAP)
	:	
-against-	:	
	:	
TWENTIETH CENTURY FOX FILM CORPORATION,	:	
ONE AMERICA PRODUCTIONS, INC.,	:	
TODD LEWIS, and	:	
SACHA BARON COHEN,	:	
	:	
Defendants.	:	
	:	
-----X	:	

**DECLARATION OF JOAN HANSEN IN SUPPORT
OF DEFENDANTS’ MOTION TO DISMISS THE COMPLAINT**

I, **JOAN HANSEN**, declare as follows:

1. I am an Assistant Secretary of defendant One America Productions, Inc. (“One America”), and submit this declaration on behalf of defendants Twentieth Century Fox Film Corporation (“Fox”), One America, Todd Schulman (“Schulman”) (incorrectly sued herein as “Todd Lewis”), and Sacha Baron Cohen (“Cohen”) (collectively, “Defendants”) in support of their Motion to Dismiss the Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil

Procedure. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Plaintiff's Complaint, which was filed on December 3, 2007, stems from Plaintiff's alleged inducement to appear in the film *Borat – Cultural Learnings of America for Make Benefit Glorious Nation of Kazakhstan* (the "Film") and his subsequent appearance in the Film.

3. On June 16, 2005, Plaintiff and One America entered into a six-paragraph release (the "Release"), whereby, in exchange for five hundred dollars (\$500), Plaintiff agreed to appear in the Film and to release various claims in connection with his appearance in the Film. (A true and correct copy of the Release and its cover page are annexed hereto as Exhibit "A").

4. As shown on the DVD of the Film (a true and correct copy of which is annexed hereto as Exhibit "B"), the Film tells the fictional story of Borat Sagdiyev ("Borat"), a Kazakh TV personality, who is dispatched to the United States to report on the American people.

5. Defendant Fox is a corporation incorporated under the laws of the State of Delaware, with its principal place of business in California.

6. Fox distributed the Film, which was first released in theaters in the United States on or about November 3, 2006, and was released on DVD in the United States on March 6, 2007.

7. Defendant One America, a California corporation with its principal place of business in California, produced the Film.

8. Defendant Cohen, a citizen of the United Kingdom and a resident of the State of California, played Borat in the Film.

9. Defendant Schulman is a citizen of the State of California and was employed by One America as the Field Coordinator for the Film.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct and that this Declaration was executed in Los Angeles, California on February 14, 2008.


JOAN HANSEN