

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WPIX, INC.,	:
WNET.ORG,	:
AMERICAN BROADCASTING COMPANIES, INC.,	:
DISNEY ENTERPRISES, INC.,	:
CBS BROADCASTING INC.,	:
CBS STUDIOS INC.,	:
THE CW TELEVISION STATIONS INC.,	:
NBCUNIVERSAL MEDIA, LLC,	:
NBC STUDIOS LLC,	:
OPEN 4 BUSINESS PRODUCTIONS LLC	:
UNIVERSAL NETWORK TELEVISION, LLC,	:
TELEMUNDO NETWORK GROUP LLC,	:
WNJU BROADCASTING LLC,	:
NBC TELEMUNDO LICENSE LLC,	:
OFFICE OF THE COMMISSIONER OF BASEBALL,	:
MLB ADVANCED MEDIA, L.P.,	:
COX MEDIA GROUP, INC.,	:
FISHER BROADCASTING-SEATTLE TV, L.L.C.,	:
TWENTIETH CENTURY FOX FILM CORPORATION,	:
FOX TELEVISION STATIONS, INC.,	:
TRIBUNE TELEVISION HOLDINGS, INC.,	:
TRIBUNE TELEVISION NORTHWEST, INC.,	:
UNIVISION TELEVISION GROUP, INC.,	:
THE UNIVISION NETWORK LIMITED PARTNERSHIP,	:
TELEFUTURA NETWORK,	:
WGBH EDUCATIONAL FOUNDATION,	:
THIRTEEN,	:
and PUBLIC BROADCASTING SERVICE,	:
 Plaintiffs,	:
 v.	:
 IVI, INC. and TODD WEAVER,	:
 Defendants.	:

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10 Civ. 07415-NRB

**DECLARATION OF STEPHEN SEGALLER**

I, Stephen Segaller, hereby declare, under penalty of perjury, that the following statement is true and correct, to my personal knowledge.


1. I am Vice President, Programming of WNET.ORG. In this position, I have primary responsibility for the coordination of all national and local programming from WNET.ORG's producing subsidiaries – THIRTEEN, WLIW21, and Creative News Group. Among the productions I coordinate are *Nature*, *Great Performances*, *American Masters*, *Cyberchase*, and *Need to Know*. I joined WNET.ORG in September 2008; prior to that, I worked for WNET.ORG's subsidiary, Educational Broadcasting Corporation, as Director of News and Public Affairs Programming. I have worked for THIRTEEN and WNET.ORG throughout the past ten years.

2. It is my understanding, based upon a press release issued by ivi, Inc., <http://www.prweb.com/releases/2010/09/prweb4487284.htm>, that on September 13, 2010, ivi began streaming copyrighted programming that was being broadcast on television stations in New York City and Seattle, Washington.

3. Attached as Exhibit 1 hereto is a listing of programs owned by THIRTEEN and broadcast by THIRTEEN and KIDSTHIRTEEN, which ivi represented they streamed between September 13, 2010 and the issuance of the district court's injunction on February 22, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 17, 2011.

  
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Stephen Segaller

**EXHIBIT 1**  
**(see attached)**