

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AUTHORS GUILD, INC., et al.,

*Plaintiffs,*

v.

HATHITRUST, et al.,

*Defendants.*

Case No. 11-cv-6351(HB)

**DECLARATION OF BLAIR SEIDLITZ**

I, Blair Seidlitz, do hereby declare that:

1. I am over eighteen years of age and am competent to make this Declaration.
2. My home address is 11829 West Tesch Avenue, Greenfield, Wisconsin 53228.
3. I am legally blind.
4. I currently am a junior at the University of Wisconsin, Madison. I am pursuing a degree in Engineering Physics and I intend to apply to Ph.D. programs when I graduate.
5. Currently, when I wish to borrow books from the Wisconsin library, I must photocopy the books and scan each page with my Kurzweil™ scanner.
6. This process is very time consuming and I try to avoid borrowing print materials from the library.
7. To complete my reading for class, I purchases accessible copies of required texts, but I do not access supplemental materials that my sighted classmates borrow from the library. If I had access to digital copies of the library's collection, I would be able to access these supplemental materials.

8. If I had access to the HathiTrust collection, I would be able to explore any topic I wanted at any time, with ease, like my sighted classmates. My education would not be confined to the limited number of topics covered in the books I purchase.

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

Executed on: 12/6/11

  
Blair Seidlitz