

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: DMCA Section 512(h) Subpoena to  
Cloudflare, Inc.

Case No.: 7:25-mc-00555-KMK

**DECLARATION OF ELIZABETH FEMIA  
IN SUPPORT OF MOTION TO QUASH SUBPOENA**

I, Elizabeth Femia, make the following Declaration under the penalty of perjury pursuant to 28 U.S.C. § 1746, and state that the following is true and correct:

1. I am an attorney at the Electronic Frontier Foundation, counsel to J. Doe, a non-party in connection with the above-referenced matter.

2. I submit this Declaration based on my personal knowledge and in support of J. Doe's motion to quash the subpoena served by Watch Tower Bible and Tract Society of Pennsylvania on Cloudflare, Inc. (the "Subpoena").

3. Attached hereto as Exhibit A are true and correct copies of websites containing the following articles as they appeared to me on February 27, 2026:

- Fern Schumer Chapman, Psychology Today, *How Religious Shunning Ruins Lives*, Mar. 27, 2024, <https://www.psychologytoday.com/us/blog/brothers-sisters-strangers/202403/how-religious-shunning-ruins-lives>;
- Rosie Luther, *What Happens to Those Who Exit Jehovah's Witnesses: An Investigation of the Impact of Shunning*, 72 Pastoral Psych. 105 (2023);
- Leonardo Blair, The Christian Post, *Woman Who Killed Self, Entire Family Was Shunned by Jehovah's Witnesses for Sending Kids to College*, Feb. 20, 2018,

<https://www.christianpost.com/news/woman-who-killed-self-entire-family-shunned-by-jehovahs-witnesses-for-sending-kids-to-college.html>;

- Monica Soriano, BBC News, *The ex-Jehovah's Witnesses shunned by their families*, July 25, 2017, <https://www.bbc.com/news/uk-40704990>.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed on this 9th day of March, 2026 in San Francisco, CA.

/s/ Elizabeth Femia  
Elizabeth Femia