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10 Attorneys for Plaintiff
STEPHANIE LENZ

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13
14 STEPHANIE LENZ,)
15) Plaintiff,) No. C 07-03783-JF
16) v.) DECLARATION OF MICAH SCHAFFER
17) UNIVERSAL MUSIC CORP., UNIVERSAL) IN SUPPORT OF OPPOSITION TO
18) MUSIC PUBLISHING, INC.,) MOTION TO DISMISS AND SPECIAL
19) and) MOTION TO STRIKE
20) UNIVERSAL MUSIC PUBLISHING GROUP,)
21) Defendants.)
22 _____)

23 I, Micah Schaffer, declare as follows:
24

25 1. I am currently an Associate Principal of Operations at YouTube, LLC (“YouTube”). I
26 have personal knowledge of the facts set forth herein. If called upon to testify thereto I could and
27 would competently do so.
28

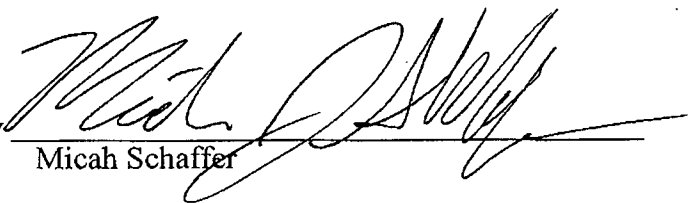
1 has been to assist in the creation and implementation of operational policies. In this capacity, I am
2 familiar with YouTube's policy and practice regarding the removal and re-posting of content in
3 connection with notices and counternotices of copyright infringement.

4 3. YouTube maintains database records of the number of times videos posted on its
5 service have been accessed. These records are kept in the normal course of YouTube's business
6 activity, and it is YouTube's regular practice to make these records. On November 9, 2007, I
7 reviewed those records with respect to the video located at
8 [http://www.youtube.com.watch?v=N1fJHFWlhQ](http://www.youtube.com/watch?v=N1fJHFWlhQ) and entitled "Let's Go Crazy #1." Based on that
9 review, I determined that the video had been viewed 273 times as of June 3, 2007.

10 4. YouTube has a feature whereby viewers of videos may post comments about them.
11 When videos are restored pursuant to a Digital Millennium Copyright Act counternotice, it is
12 YouTube's policy and practice to also restore any comments made before the video was taken
13 down.

14 I declare under penalty of perjury that the foregoing is true and correct and that this
15 document was executed in San Francisco, California.

16
17 DATED: November 12, 2007

18 By 
19 Micah Schaffer