

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**DALLAS DIVISION**

MICK HAIG PRODUCTIONS, E.K.,

Plaintiff,

v.

DOES 1-670

Defendant.

CA. 3:10-cv-01900-N

**AFFIDAVIT OF MATTHEW ZIMMERMAN**

1. My name Matthew Zimmerman. I am one of the attorneys appointed by the Court to serve as attorney ad litem for the Doe Defendants. I have personal knowledge of the matters stated in this affidavit. If called upon to do so, I am competent to testify to all matters set forth herein.

2. On January 24, 2011, after being made aware that the counsel for Plaintiff Mick Haig Productions (Evan Stone) had issued a subpoena seeking the identities of Doe Defendants in this matter to Comcast Cable on or around October 22, 2010, my organization, the Electronic Frontier Foundation, contacted Verizon to inquire as to whether Verizon had received a similar subpoena. That same day, January 24, 2011, a representative confirmed to me by e-mail that Verizon had received a similar subpoena from Mr. Stone.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed February 11, 2011, in San Francisco, California.

/s/ Matthew Zimmerman  
Matthew Zimmerman