

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DENNIS G. LOMAX,

Plaintiff,

v.

WIKIMEDIA FOUNDATION, INC. et al.,

Defendants.

Case No. 3:19-cv-30025-KAR

DECLARATION OF CHRISTOPHER M. MORRISON

I, Christopher M. Morrison, declare as follows:

1. I am a partner at the law firm of Jones Day, attorneys for Defendant Wikimedia Foundation, Inc. (“Wikimedia”) in the above-captioned action, and am one of the attorneys responsible for the defense of Wikimedia in this action.

2. Attached hereto as **Exhibit A** is a true and correct copy of Wikimedia’s Terms of Use, which are also publicly available on Wikimedia’s website at: https://foundation.wikimedia.org/wiki/Terms_of_Use/en.

3. Attached hereto as **Exhibit B** is a true and correct copy of Wikimedia’s WMF Global Ban Policy, which is also publicly available on Wikimedia’s website at: https://meta.wikimedia.org/wiki/WMF_Global_Ban_Policy.

4. Attached hereto as **Exhibit C** is a true and correct copy of an excerpt from Plaintiff’s blog, which is cited in the Amended Complaint and is also publicly available at <http://coldfusioncommunity.net/2018/04/>.

5. Attached hereto as **Exhibit D** is a true and correct copy of the “Order Dismissing Second Amended Complaint Against Defendant Wikimedia Foundation, Inc.” entered in the case

captioned *Bauer, et al. v. Glatzer, et. al*, No. L-1169-07 (N.J. Super. Ct. July 21, 2008), which is cited in Wikimedia’s Memorandum of Law in Support of Wikimedia’s Motion to Dismiss Plaintiff’s Amended Complaint.

6. Attached hereto as **Exhibit E** is a true and correct copy of the “Order Issuing Alternative Writ of Mandate” entered in the case captioned *Twitter, Inc. v. Superior Court for the City and County of San Francisco*, No. A154973 (Cal. App. 1st Aug. 17, 2018), which is cited in Wikimedia’s Memorandum of Law in Support of Wikimedia’s Motion to Dismiss Plaintiff’s Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 1, 2019
Boston, Massachusetts

/s/ Christopher M. Morrison
Christopher M. Morrison

CERTIFICATE OF SERVICE

I, Christopher M. Morrison, hereby certify that I caused a true copy of the foregoing Declaration of Christopher M. Morrison to be served through the ECF system on all parties registered to receive ECF notices in this case, and to Plaintiff via first class mail, postage prepaid.

Dated: July 1, 2019
Boston, Massachusetts

/s/ Christopher M. Morrison
Christopher M. Morrison