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8 Attorney for Plaintiff,  
9 LIBERTY MEDIA HOLDINGS, LLC

10 UNITED STATES DISTRICT COURT

11 SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION

12	LIBERTY MEDIA HOLDINGS, LLC	)	Case No. 10-CV-1823-DMS-WVG
13	Plaintiff,	)	
14	vs.	)	DECLARATION OF MARC J. RANDAZZA
15		)	IN SUPPORT OF PLAINTIFF’S MOTION TO
16	DOES 1- 3, 5, DOES 7-9, CARLOS	)	STRIKE DEFENDANT HEATHER LEWIS’
17	MANCERA (formerly Doe 10), DOE 13,	)	MOTION TO DISMISS OR IN THE
18	JOHN JOHN (formerly Doe 15), DOE 19,	)	ALTERNATIVE MOTION TO SEVER
19	DOES 21-22, DOE 24, HEATHER LEWIS	)	CLAIMS AGAINST MS. LEWIS AND
20	(formerly Doe 25); DOES 32-40; FRED	)	TRANSFER VENUE
21	MARTINEZ (formerly Doe 41); ADELINE	)	Date: March 18, 2011
22	AUGUSTIN (formerly Doe 54); DOE 55,	)	Time: 1:30 p.m.
23	Defendants	)	Place: Courtroom 10

24 I, Marc J. Randazza, declare under penalty of perjury:

- 25 1. I am the attorney for Plaintiff Liberty Media Holdings.
- 26 2. Approximately three weeks ago I spoke with Heather Lewis over the phone, and she
- 27 informed me that she was going to have her documents in this case ghostwritten.
- 28 3. I told her that such practice was unethical.
4. I spoke with Ms. Lewis on February 15, 2011, and when I questioned her as to who wrote
- the documents, she stated, “I do not know who wrote up the papers.”
5. When I asked her how she came to be in possession of fully drafted legal documents, she
- told me that, “They came from an anonymous post office box address.”

1 6. I informed Ms. Lewis that I did not believe her.

2 7. I contacted the paralegal at a law firm whose email address was used to deliver the motion  
3 papers me on February 10, 2011.

4 8. The paralegal told me that she would call me back in about 30 minutes.

5 9. Thirty minutes later, an attorney called me and confessed that he had ghostwritten the  
6 documents.

7 10. The attorney and I discussed the ethics of this practice, and he claimed he was under the  
8 belief that such acts were ethical.

9 11. Although I believe that this attorney's opinion was incorrect, I believe that he had a good-  
10 faith belief that his actions were ethical and permissible.

11

12 Signed this 16th day of February 2011 in San Diego, California.

13

s/ Marc Randazza  
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**CERTIFICATE OF SERVICE**

The undersigned does certify that the foregoing document was filed using the Court's CM/ECF system on February 16, 2011. Plaintiff served Heather Lewis personally via email, and her attorney via email. Plaintiff served the other named defendants via U.S. Mail. As Plaintiff is unable to identify the remaining Doe Defendants, Plaintiff is unable to serve them.

s/ Marc Randazza  
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