

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC; LAURA
RICCIARDI; AND MOIRA DEMOS,**

Defendants.

Civil No.: 19-CV-484

DECLARATION OF KEVIN L. VICK

I, Kevin L. Vick, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Defendants Laura Ricciardi, Moira Demos and Chrome Media LLC (collectively the “Producer Defendants”) in the above-captioned action. I have personal knowledge of the matters set forth in this declaration, unless otherwise stated. I make this declaration in support of the Producer Defendants’ Response to (1) Plaintiff’s Motion to Temporarily Restrict (Dkt. 322) and (2) Plaintiff’s Motion to Temporarily Restrict as to Video Evidence (Dkt. 305).

2. Attached as Exhibit 1 is a true and correct copy of a Reddit post and comments posted on November 5, 2022 on the subreddit “StevenAveryIsGuilty” and retrieved at 12:10 AM Pacific Time on November 6, 2022 by my colleague Meghan Fenzel. The post is titled “Colborn Response to Summary Judgment Motions” and includes a link to the PDF of Plaintiff’s opposition brief as filed on the docket on November 4, 2022. A series of comments from the

evening of November 5, 2022 starts with “They screwed up the redactions. So here they are (long post, 3 parts):” and then proceeds to copy and paste the text behind the supposed redactions from the brief filed at Dkt. 331 on November 4, 2022 by Plaintiff’s counsel George Burnett.

3. After the Producer Defendants’ counsel became aware of this issue with the redactions, I immediately conferred with Plaintiff’s counsel, and I am informed and believe that Plaintiff’s counsel April Barker worked with the Clerk of Court to replace the document with a corrected redacted version at Dkt. 331.

4. As indicated in the Producer Defendants’ November 14, 2022 filing at Dkt. 334, the Producer Defendants had an opportunity to review the substance of the designations only after filing and agreed that the document at Dkt. 331 need not be redacted or restricted, and also that the document at Dkt. 325 need not be redacted or restricted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 18, 2022

Respectfully submitted,

/s/ Kevin L. Vick
Kevin L. Vick