

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

CAROLE BASKIN and
HOWARD BASKIN,

Case No.: 8:21-cv-02558-VMC-TGW

Plaintiffs,

vs.

ROYAL GOODE PRODUCTIONS LLC and
NETFLIX, INC.,

Defendants.

_____/

**DECLARATION OF JEREMY MCBRIDE IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' EMERGENCY MOTION FOR
PRELIMINARY INJUNCTION [D.E. 4]**

I, Jeremy McBride, declare as follows:

1. I am one of the Executive Producers for Royal Goode Productions LLC (“RGP”). The matters set forth below are based either on my own knowledge or on information derived from RGP’s records.

2. RGP produced a seven-part docuseries, *Tiger King*, about the life of former zookeeper and convicted felon Joe Maldonado-Passage a/k/a Joe Exotic. The docuseries focused on the interconnected society of exotic animal owners, including Plaintiffs Carole and Howard Baskin (owners of Big Cat Rescue) and collectors such as Exotic, whom the Baskins accused of abusing and exploiting wild animals. The docuseries was released to the public on March 20, 2020 via Netflix.

3. RGP initially began filming with Carole Baskin in 2014. Over the course of the next five years, Carole Baskin entered into five appearance releases with RGP, and Howard Baskin entered into four appearance releases with RGP.

4. True and correct copies of Carole Baskin's five appearance releases with RGP, which were executed on August 15, 2014, November 5, 2017, April 3, 2018, September 17, 2018, and May 16, 2019, are attached hereto as Composite Exhibit A.

5. True and correct copies of Howard Baskin's four appearance releases with RGP, which were executed on April 30, 2016, April 3, 2018, and September 17, 2018, and May 16, 2019, are attached hereto as Composite Exhibit B.

6. Additionally, on April 3, 2018, Howard Baskin entered into a location agreement with RGP. The location agreement encompassed the Baskin's home and Big Cat Rescue. A true and correct copy of the location agreement is attached hereto as Exhibit C.

7. On May 16, 2019, Carole Baskin entered into a location agreement with RGP, which encompassed Big Cat Rescue. A true and correct copy of the location agreement is attached hereto as Exhibit D.

8. RGP has produced a sequel to *Tiger King*, called *Tiger King 2*, the first five episodes of which are scheduled to be released on Netflix on November 17, 2021 ("*Tiger King 2*").

9. A teaser trailer announcing the release date for *Tiger King 2*, which can be found at <https://www.youtube.com/watch?v=vkgSGrdL4SE>, was released on September 25, 2021.

10. The promotional trailer for *Tiger King 2*, which can be found at <https://www.youtube.com/watch?v=pT4NYto3abM>, was released on October 27, 2021.

11. *Tiger King 2* further explores the exotic animal industry, including the Baskins. In fact, one of the integral storylines of *Tiger King 2* concerns Carole Baskin, and footage of the Baskins is used throughout the docuseries.

12. RGP has devoted significant resources to producing *Tiger King 2* and will suffer significant and irreparable harm if ordered to delete footage of the Baskins or Big Cat Rescue.

13. Setting aside the creative intrusion of requiring RGP to remove the footage, requiring *Tiger King 2* to be re-edited at this stage would unavoidably delay its release date and adversely impact RGP in ways that cannot be quantified or adequately compensated with money.

14. It is not an easy task to remove even a short scene from a finished docuseries. I have been actively involved in the pre-production, production, and post-production phases of *Tiger King 2*, which obviously represented a major financial investment. During production we created more than 750 hours of footage over 265 shoot days, which RGP cut into the final docuseries.

15. Any changes to the finished docuseries will require a re-edit, which must be completed by the post-production team. When a docuseries is complete, the post-production team is released and moves on to other projects. RGP has already cycled out key staff on its editorial team, and they have moved on to other projects.

Therefore, it would be near impossible to bring the editorial team back and RGP would need to hire a new production team unfamiliar with the docuseries to perform the re-edit. The director and editing team must then work together to remove not only the scenes at issue, but also all other scenes or story points that reference or depend on the excised scenes. After that is complete, master files are created to be used for streaming through Netflix.

16. The process is very precise. Much thought went into all of the choices made in *Tiger King 2*, from specific lines, camera angles, music, etc. Music is also composed and recorded to match the exact length and emotion of the docuseries. Requiring the docuseries to be re-edited would require a new sound mix and a re-delivery of all master elements that are needed, including the process of reconstructing all of them, which is very time-consuming.

17. Issues with international distribution then add another layer of complexity and delay. When the re-edited docuseries is final, it must be provided to external vendors for translation into other languages, dubbing (the addition of voice-overs in other languages), and the addition of subtitles. All new content must first be translated. That new content must then be read by the same voice-over talent who provided the original voice-overs so they match—if that talent is not immediately available, that introduces additional delay. When translation and dubbing are complete, the docuseries must then be re-subtitled in English (or another applicable language).

18. If RGP were required to extract footage and re-edit *Tiger King 2*, it would be at tremendous cost and time to reconstruct the docuseries. It is possible that RGP also would need to shoot additional footage to make the story work without the scenes at issue.

19. Netflix also had a very detailed delivery schedule, which in this case took a huge team and hundreds of thousands of dollars in order to comply with it. Much of that effort and expense will have been wasted if RGP is required now to re-cut *Tiger King 2*.

20. RGP conservatively estimates that it would take a minimum of four months to re-edit *Tiger King 2* and have it prepared to stream globally on Netflix. Of course, it would be impossible to complete that work in time to meet the release date of November 17, 2021.

21. If *Tiger King 2* was released after the release date, RGP would suffer immediate, quantifiable, and substantial financial harm. As an initial matter, based on our experience with other similar projects, and the actual expense of the initial post-production process, RGP conservatively estimates that the hard costs to re-edit *Tiger King 2* would be a minimum of several hundred thousand dollars.

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

Executed on: November 8, 2021.

DocuSigned by:

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Jeremy McBride
Executive Producer, RGP