

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

I, Sean Dobson, declare as follows:

1. I am Manager, U.S. Nonfiction Marketing, Documentary Series at Netflix, Inc. The matters set forth below are based either on my own knowledge or on information derived from Netflix records.

2. On March 20, 2020, Netflix released the seven-part documentary, *Tiger King*, about the life of former zookeeper and convicted felon Joe Maldonado-Passage a/k/a Joe Exotic. The documentary series focused on the interconnected society of big cat conservationists, including Plaintiffs Carole and Howard Baskin (owners of Big Cat Rescue) and collectors such as Joe Exotic.

3. *Tiger King* was viewed by 64 million households over its first month of release.

4. Netflix plans to release the first five episodes of *Tiger King 2* on November 17, 2021 (“*Tiger King 2*”).
5. On September 23, 2021, Netflix announced that there would be a second season of *Tiger King*.
6. On September 25, 2021, Netflix hosted its first ever global fan event—Tudum—which gave viewers previews to a number of different upcoming Netflix titles. During the event, which garnered more than 690 million views, Netflix announced the November 17, 2021 release of *Tiger King 2*. The teaser trailer, which has more than 400,000 views on YouTube alone, can be found on Netflix’s YouTube channel at: <https://www.youtube.com/watch?v=vkgSGrdL4SE>.
7. On October 27, 2021, Netflix released the official promotional trailer for *Tiger King 2*. The promotional trailer, which has nearly 2 million views on YouTube alone, can be found on Netflix’s YouTube channel at: <https://www.youtube.com/watch?v=pT4NYto3abM>.
8. If the Court were to enjoin the use of any footage of the Baskins and Big Cat Rescue filmed by Royal Goode Productions, it would significantly delay the release of *Tiger King 2*.
9. If the release of *Tiger King 2* is delayed, Netflix would lose the value of its advertising and marketing spends, which promoted a November 17, 2021 release for *Tiger King 2*. Netflix would be required to incur significant additional expenses in new promotion, advertising and marketing costs.

10. If the release of *Tiger King 2* were enjoined while this action is litigated, and it were later determined that it should not have been enjoined, the cost to Netflix (including due to additional advertising and marketing costs) would be more than a million dollars, depending on the length of the injunction.

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

Executed on: November 8, 2021.

DocuSigned by:
Sean Dobson
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Sean Dobson