Case No.: 8:11-cv-00731-JVS-AN

NORTHLAND FAMILY PLANNING CLINIC, INC.,

Plaintiff,

vs.

CENTER FOR BIO-ETHICAL REFORM, et al.,

Defendants.

I, Robert J. Muise, make this declaration pursuant to 28 U.S.C. § 1746 and in support of Defendants’ opposition to Plaintiff’s motion for summary judgment.
1. I am Senior Counsel for the American Freedom Law Center and co-counsel in the above-captioned case representing Defendants. I have personal knowledge of the facts set forth in this declaration.

2. Attached to this declaration as Exhibit A are true and correct copies of emails produced by Plaintiff in response to Defendants’ document requests. The emails evidence communications with Plaintiff regarding the videos at issue in this case. These documents were redacted and bates numbered by Plaintiff as follows: NFP_000038 and NFP_000048-B.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11th day of May, 2012.

[Signature]

Robert J. Muise
Everyday Good Women video

To: info@northlandfamilyplanning.com
Cc: K. P. <K.P.2010@gmail.com>

Mon, Jun 27, 2011 at 7:18 PM

My name is S. V. and I am a project manager engage to lead the website redesign for Humedco. Humedco is headquartered in Cherry Hill, NJ and owns or operates several women's health clinics with locations from Rhode Island to Atlanta, GA.

We are interested in using your video, Everyday Good Women on our web sites. I am writing to inquire about gaining access to the video.

I can be contacted via email or mobile phone [redacted]. I look forward to hearing from you.

Regards,

S. V.
Hi Renee,

It does not look like you made it. I think it’s quite clear that they used your footage to make a point. It seems quite clear that you didn’t make it. As for whether or not they use it for D&E legislation, that’s exactly why you need an attorney to get them to take it down.

You should use your concern about violence against you staff to make a case.

Let me know what’s going on with this Renee. You have every reason to be upset.

Love,

C

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thanks C and tell M I said thank you. I will forward to my attorney as well.

I do know that they preach to their own choir but I am worried about this.