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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**ME2 PRODUCTIONS, INC, and
CELL FILM HOLDINGS, LLC.**

Plaintiffs

v.

WILLIAM PATRICK SHELDON,

Defendant.

Case No.: 3:17-cv-00158-SB

DONNA VIOLETTE'S DECLARATION

In support of Defendant's Opposition to Plaintiffs'
Motion to Dismiss

I, Donna Violette make this declaration:

1. I am the owner of the property at 3903 SW Baird Street in Portland Oregon. I am also the lessor of the property to Mr. Sheldon, the Defendant in this case, who has lived at the property since October 1, 2016.

2. This is a home with multiple units that, at times, includes up to nine continuous residents. We all share Internet that is secured by a common password and which I control and share as the Internet subscriber.

3. I am the Internet subscriber with the IP address that Mr. Crowell initially named in this lawsuit. In that complaint, Mr. Crowell alleged that I have been "observed as "associated

with peer-to-peer exchange of over 900 other copyrighted titles” including “observed and confirmed acts of distribution of the title *Cell*.”

4. This is not true and, I believe, not forensically possible to identify me or the other five people who live on my premises.

5. When Mr. Sheldon moved onto my property, there were four other people living on the premises with access to the shared Internet access. It is impossible to know how many guests of these resident, and prior tenants, may have had access to the Internet password at this time.

6. In January or February 2017, I received a letter and legal documents from Mr. Crowell alleging that copyrighted films had been downloaded using my Internet, and that there would be a lawsuit against me with potential fines in the hundreds of thousands of dollars. The letter also references possible prison time.

7. I contacted Mr. Crowell immediately, assuring him that I did not do this and that I had never downloaded anything in my life.

8. Mr. Crowell told me that if I didn't give him the information he wanted the he would subpoena me. Mr. Crowell asked for the names of the other people who had access to the Internet at my property. I gave him the names of the four people, including Mr. Sheldon, the Defendant.

9. Mr. Crowell also made it clear that the computer activity through my ISP address included the viewing of pornography. Given that Mr. Crowell identified that he represented the owners of a movie, I found it troubling and coercive that Mr. Crowell began speaking to me

about pornography that was no of his or his alleged clients' business. Suddenly, I was envisioning my tenants watching pornography. Mr. Crowell's accusations about me or my tenants viewing pornography about which he has no legal interest were an unwelcome intrusion.

10. I told him that I would speak with all the residents, with whom I have long-standing, honest relationships, including Mr. Sheldon. At the time Mr. Sheldon moved in there were six people living on the premises.

11. I spoke with four other residents, in addition to myself, who have been living under my roof since Mr. Sheldon moved in. All of them denied downloading films. At this time, Mr. Sheldon was suffering from a chronic condition, and I did not see him to inquire about the matter.

12. When I phoned Mr. Crowell to tell him that everyone denied copyright infringement, but that I had not yet had the opportunity to speak with Mr. Sheldon, he told me that it must be Mr. Sheldon, even though there were five other people living on the premises at the same time as Mr. Sheldon. Mr. Crowell seemed fixated on Mr. Sheldon.

13. After speaking with Mr. Sheldon, I was convinced that he, too, was not involved in the illegal activity Mr. Crowell leveled against my tenants and me. I phoned Mr. Crowell and told him that there must be some mistake.

14. Mr. Crowell's fixation on Mr. Sheldon was strange to me, and did not make sense, given the fact that I had explained to Mr. Crowell that there were **a total of six people** on the premises, all with internet access, and all who denied downloading films.

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

Executed this 3 day of June 2017.

Donna Violette
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