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11 Attorneys for Plaintiff
RON PAUL 2012 PRESIDENTIAL CAMPAIGN COMMITTEE, INC.

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 RON PAUL 2012 PRESIDENTIAL
16 CAMPAIGN COMMITTEE, INC.
A Delaware Corporation,
17
18 Plaintiff,
19 v.
20 John Does, 1 through 10,
21
22 Defendants.

Case No. CV-12-00240-MEJ

**DECLARATION OF JESSE
BENTON IN SUPPORT OF
PLAINTIFF'S EX PARTE
APPLICATION FOR EXPEDITED
DISCOVERY**

1 I, Jesse Benton hereby declares:

2 1. I have personal knowledge of the matters stated herein and, if called
3 upon, I could and would testify competently thereto. I submit this declaration in
4 support of Plaintiff Ron Paul 2012 Presidential Campaign Committee, Inc.'s
5 ("Plaintiff") *ex parte* application for expedited discovery. I am Plaintiff's
6 Campaign Manager and my responsibilities include supervision of all campaign
7 commercials.

8 2. Plaintiff promotes, supports, and endorses Dr. Ron Paul as the 2012
9 Republican nominee for President of the United States.

10 3. The John Doe defendants described in the Complaint uploaded the
11 subject video onto YouTube entitled "Jon Huntsman's Values" ("the Video"). The
12 Video, which is accompanied throughout with traditional Chinese music in the
13 background, begins with the text "Jon Huntsman – American Values? / The
14 Manchurian Candidate - What's He Hiding?" The Video shows, among other
15 things, 2012 Republican presidential candidate Jon Huntsman speaking a foreign
16 language and then inquires whether Mr. Huntsman is "weak on China." The Video
17 also questions Mr. Huntsman's religious faith, refers to Mr. Huntsman as "China
18 Jon," and asks whether his daughters are "even adopted." The Video ends with a
19 fictitious depiction of Mr. Huntsman in a Mao Zedong uniform and the text
20 "American Values and Liberty – Vote Ron Paul," thereby falsely implying that
21 Plaintiff created, endorsed, or is affiliated in some way with the Video and its
22 content.

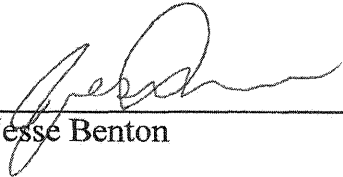
23 4. Plaintiff did not create or endorse the Video and is not affiliated in any
24 way with the Video or its content.

25 5. Defendants did not publicly use their true names or contact
26 information in association with the Video and, instead, have used the pseudonym
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1 NHLiberty4Paul. The Defendants' pseudonym NHLiberty4Paul is also an account
2 with Twitter, Inc.

3 I declare under penalty of perjury of the laws of the United States of America
4 that the foregoing is true and correct and that this declaration is executed on this
5 13th day of January 2012, at ROCK HILL, SC.

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8 _____
Jesse Benton

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