IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RACHEL DELOACHE WILLIAMS,

                    Plaintiff,

    v.

NETFLIX, INC.,

                 Defendant.

C.A. No. 22-cv-1132-CFC

DECLARATION OF ALEXANDER RUFUS-ISAACS

1.   I am admitted *pro hac vice* to this Court and counsel of record for Plaintiff Rachel DeLoache Williams in the above-captioned matter. I submit this declaration based on personal knowledge, and if called upon as a witness, I could competently testify to the truth of each statement herein.

2.   I make this declaration in support of Plaintiff's Opposition to Defendant Netflix Inc.'s Motion to Dismiss the Complaint for Failure to State a Claim.

3.   Attached hereto marked Exhibit 1 is a true and correct copy of a chart which reproduces the descriptive columns of Netflix's chart (D.I. 16-5) and substitutes Williams' factual claims from the Complaint in place of Netflix's factual claims, and substitutes summary versions of her legal arguments as to why the statements are actionable.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: December 7, 2022   _____

                                                         Alexander Rufus-Isaacs

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