

**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 Transfer.

3. My co-counsel Rodney Smolla and I considered filing this action in New York, but elected to file in Delaware to avoid the risk that a New York court might reject the case on jurisdictional grounds for the reasons set forth in our Response to this Motion. We instead decided that in order to ensure Ms. Williams' legitimate interest in pursuing justice as swiftly as possible, it was best to bring the case in a forum in which jurisdiction was clear.

4. Netflix is a dominant world media giant with over 209 million subscribers. In 2020, it reported total revenue of over \$24.9 billion, as evidenced by its 10-K Report to the US Securities and Exchange Commission for 2020. True and correct copies of the title page of that report and the page setting out Netflix's annual revenues for 2020 is attached hereto marked Exhibit 1. The rest of the 10-K Report has been omitted for brevity.

5. On behalf of Ms. Williams, we intend to depose most or all of the individuals who created the Netflix series, *Inventing Anna*, because they will have first-hand knowledge about how the series was created, and the decisions which led to the inclusion of the defamatory statements identified in the Complaint. Attached hereto marked Exhibit 2 is a true and correct copy of a chart prepared at my direction by my paralegal which lists the 21 persons who are credited on <https://pro.imdb.com/title/tt8740976/filmmakers> as either a producer, director or writer of series, broken down by episode and their estimated geographical location (based on where their listed representatives are based). [www.pro.imdb.com is the online professional version of the Internet Movie Data Base to which my firm has a paid subscription. It is regarded in the entertainment industry as the most authoritative reference resource for credits on films and television programs and the identity and location of the subject's professional representatives.] Of these 21 persons, it appears that 12 live and work in the Los Angeles area, and another 6

appear to divide their time between Los Angeles and other locations, including New York, Toronto, and London.

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