UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re DMCA Subpoena to Google LLC	**Case No.** 7:19-mc-82
	Declaration of Paul D. Polidoro in Support of Watch Tower Bible and Tract Society's Request to the Clerk for Issuance of Subpoena to Google LLC, Pursuant to 17 U.S.C. § 512(h) to Identify Alleged Infringer

PAUL D. POLIDORO, counsel of record for Plaintiff Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") in the above-referenced matter, hereby declares as follows:

1. I am authorized to act on behalf of Watch Tower.
2. I submit this declaration in support of Watch Tower's request for issuance to Google LLC of a subpoena, pursuant to the Digital Millennium Copyright Act ("DMCA") 17 U.S.C. § 512(h) (hereinafter "DMCA Subpoena"), to identify the user identified as: "Historia Y Ayuda Teocrática JW".
3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted notifications to YouTube (Google LLC) identifying the infringing content posted by the aforementioned user and providing the information required by 17 U.S.C. § 512 (c)(3)(A). True and accurate copies of the submitted notifications are attached hereto as Exhibit 1.
4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers and such information will only be used for the purpose of protecting Watch Tower's rights under title 17 U.S.C. §§ 100, *et. seq*.

I declare under penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct. Executed this 25th day of February 2019.

Paul D. Polidoro

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