

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE LITERARY WORKS IN ELECTRONIC
DATABASES COPYRIGHT LITIGATION
(GBD)

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) Master Docket No. M-21-90
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) (MDL # 1379)
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**DECLARATION OF JEFF SEIDEL IN SUPPORT OF
FINAL SETTLEMENT APPROVAL**

I, Jeff Seidel, being duly sworn, deposes and says:

1. I am a freelance author and class member in the In re Literary Works In Electronic Databases Copyright Litigation, MDL 1379. I submit this declaration in support of Plaintiffs' motion for final approval of the proposed Settlement. I have personal knowledge of the facts stated herein and, if called on to do so, could and would testify competently thereto.

2. I have been publishing literary works as a freelance author since 1986.

3. I believe that I have literary works which are covered under the proposed Settlement, and I have filed my claim in the Settlement. My claim under the Settlement is comprised of approximately 3,300 works, categorized as C works. Under the plan of allocation matrix preliminarily approved by the District Court, I have estimated that my claim is worth at least \$21,000.

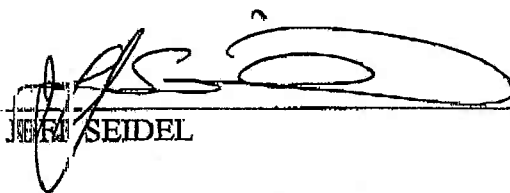
4. In my claim, I did not enforce my "takedown" rights, as I wish to receive 100% of my allocated Settlement proceeds, representing damages for the past infringements and a dollar value for the Defendants' non-exclusive use of those works

going forward.

5. I support this class action Settlement as fair to the Class members, and want to receive my permitted share of the Settlement proceeds as approved by the District Court.

6. This settlement will be very helpful to my family for several reasons, mainly dealing with fiscal considerations as we've had a number of hardships over the past few years. My wife has multiple sclerosis and, while still working, she has many doctor's appointments and medicines. My daughter has a rare condition -- Ehlers-Danlos Syndrome, where she needs a variety of elbow and wrist braces that have to be changed as she grows. All of this has hurt us financially in many ways, and this settlement will go a long way towards relieving some of the worries that plague us.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed September 16, 2005 at Baltimore, Maryland.


J. SEIDEL