

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

IN RE LITERARY WORKS IN ELECTRONIC
DATABASES COPYRIGHT LITIGATION

Master Docket No. M-21-90 (GBD)
(MDL # 1379)

DECLARATION OF PAMELA FERRIS-OLSON IN SUPPORT OF
FINAL SETTLEMENT APPROVAL

I, Pamela Ferris-Olson declare as follows:

1. I am a freelance author and class member in 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 class action settlement in this lawsuit. 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 selling publication rights to my literary works as a freelance author since 1995.

3. I believe that I have literary works that are eligible for a claim under the proposed settlement, and I have filed such claim. This claim is based on approximately works, approximately 1,548 which fall into Category C. Under the plan of allocation granted preliminary approval by the District Court, I estimate that the total payment for this claim, calculated using the amounts set forth in the Plan of Allocation, is \$9,962.50.

4. In my claim, I did not enforce my "takedown" rights, as I wish to receive 100% of my claim payment, representing damages for past infringements and compensation for Defendants' right to a broad, non-exclusive electronic use of those works going forward, including the right to convey the works to other entities for resale to end-users.

5. I believe the proposed settlement is fair, adequate, and reasonable for me as a class member, and support final approval of the settlement and plan of allocation so that I can receive my share of the Settlement proceeds as approved by the District Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed September 15, 2005, at Centerville, Ohio.


PAMELA FERRIS-OLSON