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13 Attorneys for Reddit, Inc.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO COUNTY**

17 *In re Subpoena to:*
18 *Reddit, Inc.,*

CASE NO. 3:24-MC-80005-JD

**DECLARATION OF HAYDEN
SCHOTTLAENDER IN SUPPORT OF
REDDIT, INC.'S MOTION FOR FEES**

DATE: AUGUST 7, 2025
TIME: 10:00 A.M.
JUDGE: HON. JAMES DONATO

1 I, Hayden M. Schottlaender, declare as follows:

2 1. I am a partner of the law firm Perkins Coie LLP, an international law firm with
3 more than 1,000 attorneys.

4 2. I am counsel of record for non-party Reddit, Inc. (“Reddit”) in the above-
5 captioned matter. I am admitted pro hac vice to practice before this Court in this matter, have
6 personal knowledge of the facts stated herein, and, if called and sworn as a witness, could and
7 would testify competently thereto.

8 3. I submit this declaration in support of Reddit’s contemporaneously filed Motion
9 for Fees. This declaration describes litigation activities conducted by Perkins Coie timekeepers in
10 this matter and the fees associated with such activities. The information contained in this
11 declaration was obtained from reviewing the timekeeper records associated with the matter.
12 Perkins Coie timekeepers record their time at or near the time that the activity was performed.

13 4. Attached as **Exhibit A** are true and correct excerpts from Perkins Coie’s regularly
14 maintained billing records. These records reflect entries as they were billed to Reddit for work
15 necessarily performed on Reddit’s behalf in connection with (a) the research, drafting, and
16 revision of Reddit’s opposition to Movants’ motion to compel compliance with a third-party
17 subpoena (Doc. 20), (b) the research, drafting, and revision of Reddit’s opposition to Movants’
18 motion for de novo review (Doc. 33), and (c) preparation for, and participation in, oral argument
19 on Movants’ motion for de novo review before the Court on May 16, 2024 (collectively, the
20 “Subpoena Dispute”). These records reflect the time reasonably expended and the fees actually
21 incurred by three timekeepers—myself, Jameson Ullman, and Jordan C. Harris—for the period of
22 January 9, 2024, through May 27, 2024. I have excluded entries from other Perkins Coie partners
23 who reviewed briefing associated with the Subpoena Dispute, as well as entries from non-lawyer
24 professionals working on the matter. And I have excluded any entries that were not obviously and
25 directly attributable to the Subpoena Dispute.

26 5. I have personally reviewed each entry contained in Exhibit A for accuracy and
27

1 confirm that the tasks, hours, rates, and amounts recorded are correct and that the billing
2 narratives are as they were when presented to Reddit for payment. These fees were incurred to
3 research, draft, revise, and argue Reddit's opposition papers, to comply with local rules and court
4 orders, and to prepare for and attend oral argument.

5 6. The totals reflected in Exhibit A are as follows:

- 6 a. Mr. Schottlaender billed 31.9 hours at an hourly billing rate of at least
7 \$813.75 for a total of at least \$25,958.63 in attorney's fees.
8 b. Mr. Ullman billed 12.8 hours at an hourly billing rate of at least \$568.75 for
9 a total of at least \$9,270.63 in attorney's fees.
10 c. Mr. Harris billed 26.7 hours at an hourly billing rate of at least \$748.13 for a
11 total of at least \$19,974.94 in attorney's fees.
12 d. The total fees for these three timekeepers for both motions and oral argument
13 for the later motion totals at least \$55,204.19 in attorney's fees.

14 7. The fees described above are net of a significant discount to the timekeepers'
15 standard rates provided to Reddit for this matter.

16 8. All work performed was necessary to protect Reddit's interests, was not
17 duplicative, and could not have been accomplished by attorneys with lower rates without
18 compromising efficiency or quality. This level of counsel was necessary in light of the possible
19 significant implications on Reddit's business and users from an adverse ruling that would permit
20 non-party discovery to unmask pseudonymous Reddit users notwithstanding their First
21 Amendment rights to anonymous online speech.

22 9. This matter was the third round in a contentious dispute between Reddit and
23 Movants. Like the previous two matters, this matter concerned the scope of the First Amendment
24 protection for anonymous online speech. Specifically, whether Movants could use a non-party
25 subpoena to Reddit to obtain the IP addresses, and therefore unmask the identities of,
26 pseudonymous Reddit users. The ability to communicate pseudonymously is a valuable feature
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1 for Reddit's users and one that Reddit is serious about protecting. Movants argued that the IP
2 addresses of these Reddit users were relevant to their underlying secondary copyright
3 infringement case because the users discussed copyright infringement on the platform. Reddit
4 maintains that this speech is protected under the First Amendment, that *Doe v. 2TheMart.com*,
5 140 F. Supp. 2d 1088, 1095 (W.D. Wash. 2001) provides the relevant standard for when a non-
6 party subpoena can be used to unmask non-party anonymous speakers online, and that Movants
7 failed to meet that standard here. Reddit sought to protect its business and its users from this third
8 attack by Movants, and to deter similar attacks in the future.

9 10. The time expended was reasonable in light of the expedited schedules imposed by
10 the Court and the seriousness of the questions presented for Reddit's business.

11 11. The hourly rates charged by the three timekeepers are commensurate with, and in
12 many instances below, prevailing market rates for attorneys of comparable experience practicing
13 complex civil litigation in the Northern District of California.

14 12. I am a partner with unique and significant experience representing technology
15 companies in litigation, including specific experience representing online platforms in First
16 Amendment issues associated with third-party requests for user data. I represented Reddit in the
17 two prior subpoenas that it successfully opposed against some of the same Movants as this case,
18 *In re Reddit, Inc.*, 671 F. Supp. 3d 1022 (N.D. Cal. Apr. 28, 2023) ("Reddit I") and *In re Reddit*,
19 *Inc.*, No. 3:23-mc-80173, 2023 WL 4849434 (N.D. Cal. July 29, 2023) ("Reddit II"). I also
20 previously worked full time for Twitter, Inc. (on secondment), again with a particular emphasis
21 on advising Twitter on third party requests for user data. I have represented platforms in several
22 matters relevant to this case, including representing Twitter in *In re DMCA § 512(h) Subpoena to*
23 *Twitter, Inc.*, 608 F. Supp. 3d 868 (N.D. Cal. 2022), involving the intersection of the First
24 Amendment and the Digital Millennium Copyright Act's subpoena provisions, and cited in both
25 *Reddit I* and *Reddit II*. My work on this engagement consisted of developing and implementing
26 overall litigation strategy, including the management of Reddit's briefs in opposition to Movants'

1 motion to compel and motion for de novo review, and conducting oral argument concerning the
2 later motion. Given my depth of experience, my billing rate of \$813.75 per hour for this matter is
3 reasonable and within the market range for partners of similar tenure and expertise in this market.

4 13. Jordan C. Harris is a senior associate who concentrates on representing technology
5 companies in complex civil litigation involving privacy law, including representing technology
6 companies in responding to non-party subpoenas. He served as the principal drafter of Reddit's
7 opposition to Movants' motion for de novo review and assisted with oral-argument preparation.
8 His rate of \$748.13 per hour reflects his specialized subject-matter expertise and is comparable to
9 rates charged by peers with similar credentials in this market.

10 14. Jameson Ullman is a mid-level associate who also concentrates on representing
11 sophisticated technology companies in complex civil litigation. He recently clerked for the
12 Honorable Trina Thompson of the United States District Court for the Northern District of
13 California. His work on this engagement centered on drafting Reddit's opposition to Movants'
14 motion to compel and preparing related filings. His billing rate of \$568.75 per hour is consistent
15 with rates charged by a mid-level associate of his caliber in this market.

16 I declare under penalty of perjury that the foregoing is true and correct.

17
18 Executed on July 1, 2025.

19 By: Hayden M. Schottlaender
Hayden M. Schottlaender