

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOWARD K. STERN,

Plaintiff,

-against-

RITA COSBY, HACHETTE BOOK GROUP
USA, INC., d/b/a GRAND CENTRAL PUBLISHING,
and JOHN OR JANE DOE,

Defendants.

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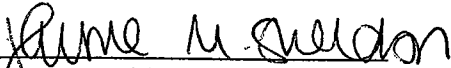
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Deborah J. Newman, hereby declares:

1. I am counsel at Akin Gump Strauss Hauer & Feld LLP, attorneys for defendant Hachette Book Group USA, Inc. ("Hachette").
2. I submit this affidavit in support of defendant Hachette's Reply Memorandum Of Law In Support Of Its Motion For Summary Judgment.
3. A true and correct copy of excerpts from the Deposition Transcript of Amy Einhorn, dated September 9, 2008, is attached as Exhibit A.
4. A true and correct copy of excerpts from the Deposition Transcript of Mitchell D. Hoffman, dated September 10, 2008, is attached as Exhibit B.


DEBORAH J. NEWMAN

Sworn before me this 13th day
of March, 2009.


Notary Public

JAIME M. SHELDON
Notary Public, State of New York
No. 01SH6140377
Qualified in QUEENS County
Commission Expires JANUARY 30, 2010

EXHIBIT A

REDACTED PURSUANT TO
THE AMENDED CONSENT PROTECTIVE ORDER GOVERNING
CONFIDENTIAL AND HIGHLY CONFIDENTIAL
INFORMATION DATED JULY 2, 2008
AND COURT ORDER DATED DECEMBER 11, 2008

EXHIBIT B

REDACTED PURSUANT TO
THE AMENDED CONSENT PROTECTIVE ORDER GOVERNING
CONFIDENTIAL AND HIGHLY CONFIDENTIAL
INFORMATION DATED JULY 2, 2008
AND COURT ORDER DATED DECEMBER 11, 2008