

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 0:16-CV-61511-WJZ

CAROL WILDING, et al.,

Plaintiffs,

v.

DNC SERVICES CORP., d/b/a
DEMOCRATIC NATIONAL COMMITTEE,
et al.,

Defendants.

**DECLARATION OF ELISABETH C. FROST IN SUPPORT OF DEFENDANTS' REPLY
IN SUPPORT OF MOTION TO QUASH SERVICE OF PROCESS, OR, IN THE
ALTERNATIVE, EXTEND TIME TO ANSWER OR RESPOND TO COMPLAINT**

I, ELISABETH C. FROST, declare as follows:

I am an attorney with the law firm of Perkins Coie LLP, and am counsel for Defendants in this litigation. I have personal knowledge of the matters set forth below and am competent to testify.

1. Attached as Exhibit A are true and correct copies of emails sent by the undersigned to Plaintiffs' counsel in this litigation, dated July 15, 2016, July 19, 2016, and August 11, 2016.

2. Attached as Exhibit B is a true and correct copy of a screenshot from a post titled "*JamPAC: A Hack For An Ailing Political System*," published on April 14, 2016 on a blog called "Beck's Law," attributed to Jared Beck, who is described as the "managing partner" of Beck & Lee, located in Miami. The electronic version of the post was accessible and available at <https://beckandlee.wordpress.com/2016/04/14/jampac-a-hack-for-an-ailing-political-system/>, as of August 13, 2016. The highlighting in the exhibit has been added by the undersigned for the Court's ease of reference.

3. Attached as Exhibit C are true and correct screenshots of a retweet and two tweets posted to the Twitter page maintained by Jared Beck (@JaredBeck), found at <https://twitter.com/JaredBeck>. The page includes a photograph of Mr. Beck, appearing to be the

same Mr. Beck serving as counsel for Plaintiffs in this action, as well as the following statement: “I practice law (<http://beckandlee.com>) and help run JamPAC.” The retweet and related tweet are dated July 14, 2016 and, as of August 13, 2016, were still available online at <https://twitter.com/YogiBarista/status/753777636669788161>, and <https://twitter.com/JaredBeck/status/753775894620086272>; the other tweet is dated July 16, 2016 and, as of August 15, 2016, was still available online at <https://twitter.com/JaredBeck/status/754453732990054404>.

4. Attached as Exhibit D is a true and correct screenshot of a tweet posted to the Twitter page maintained by Jared Beck, described above in paragraph 3. The tweet is dated July 14, 2016 and, as of August 13, 2016, was still available online at <https://twitter.com/JaredBeck/status/753792853042614277>.

5. Attached as Exhibit E is a true and correct screenshot of a tweet posted to the Twitter page maintained by Jared Beck, described above in paragraph 3. The tweet is dated July 24, 2016 and, as of August 13, 2016, was still available online at <https://twitter.com/JaredBeck/status/757337974468075520>.

6. Attached as Exhibit F are true and correct screenshots of tweets posted to the Twitter page maintained by the username @eleebeck, which includes a photograph of a person who appears to be Plaintiffs’ counsel Elizabeth Lee Beck, described as a lawyer who “run[s] JamPAC, a progressive super PAC, with my hubby @JaredBeck.” The Twitter page can be accessed at <https://twitter.com/eleebeck>. The page also includes multiple tweets about this lawsuit. The tweets are dated July 23, 2016 and, as of August 13, 2016, were still available online at <https://twitter.com/eleebeck/status/757053021025099776>, and <https://twitter.com/eleebeck/status/757052699972173825>.

7. Attached as Exhibit G is a true and correct screenshot of a retweet posted to the Twitter page maintained by Jared Beck, described above in paragraph 3. The retweet is dated July 26, 2016 and, as of August 13, 2016, was still available online at <https://twitter.com/locobedoya/status/757934286968352768>. Mr. Beck’s tweet included a

photograph of what appears to be a body. In the interest of not further disseminating any insensitive photographs, and out of respect for the privacy of the decedent and his family, the undersigned redacted that photograph from the attached exhibit.

8. Attached as Exhibit H is a true and correct screenshot of a tweet posted to the Twitter page maintained by Jared Beck, described above in paragraph 3. The tweet is dated July 26, 2016 and, as of August 13, 2016, was still available online at <https://twitter.com/JaredBeck/status/758141447602262017>.

9. Attached as Exhibit I is a true and correct screenshot of a tweet posted to the Twitter page maintained by Jared Beck, described above in paragraph 3. The tweet is dated August 5, 2016, and, as of August 13, 2016, was still available online at <https://twitter.com/JaredBeck/status/761753935954620416>.

10. Attached as Exhibit J is a true and correct screenshot of a post on the DNC Fraud Lawsuit page maintained by attorneys Elizabeth Lee Beck, Jared H. Beck, Antonino Hernandez, and Cullin O'Brien. The web address for the page is <https://www.facebook.com/DNCfraudlawsuit>. The post is dated July 18, 2016 and, as of August 13, 2016, was still available at <https://www.facebook.com/DNCfraudlawsuit/photos/a.612142428948569.1073741828.612127198950092/625922000903945/?type=3&theater>.

11. Attached as Exhibit K is a true and correct copy of the webpage maintained by Elizabeth Beck on JamPAC's website for "Miscellaneous (Non-Court Filed) Documents: Wilding DNC Class Action Lawsuit, and, as of August 15, 2016, was still available at <http://jampac.us/2016/07/18/miscellaneous-docs/>.

EXECUTED this 15th day of August, 2016 at Washington, D.C.

/s/Elisabeth C. Frost
Elisabeth C. Frost