

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

**GEORGE OUZOUNIAN, P/K/A MADDOX,
and JANE DOE,**

Plaintiffs,

Index No. 656779/2017

-against-

**DAX HERRERA P/K/A DICK MASTERSON,
FOUNDATION DIGITAL, LLC, GREG BOSER,
LOREN BAKER, CMGRP, INC. D/B/A WEBER
SHANDWICK, JOSHUA KAUFMAN,
ASTERIOS KOKKINOS, TREVOR BIRT,
PATREON, INC., and JORDAN COPE,
Defendants.**

AFFIRMATION OF JOSHUA KAUFMAN

JOSHUA KAUFMAN, an attorney duly admitted to practice law in the State of New York, hereby affirms the following under the penalties of perjury, pursuant to CPLR § 2106:

1. I am a Defendant in the above-captioned matter. I am also the General Counsel and Senior Vice President, Business and Legal Affairs for Defendant CMGRP, Inc., d/b/a Weber Shandwick (“WS”).

2. I respectfully submit this affirmation in support of the Motion filed simultaneously herewith on behalf of myself and WS, to dismiss the complaint filed by plaintiffs George Ouzounian, p/k/a Maddox and Jane Doe (“Complaint”), as to those Causes of Action asserted against WS and myself, based on documentary evidence and for failure to state a claim upon which relief can be granted.

3. WS is a leading global communications and engagement firm, headquartered in New York City and with offices located in 77 cities across 31 countries, employing over 3,600

professionals. WS is a wholly-owned unit of The Interpublic Group of Companies, Inc., a public company listed on the New York Stock Exchange. WS is a leader in all key public relations practices and provides services in corporate issues and advocacy advertising, market research and visual communications.

4. Attached hereto as Exhibit 1 is a true and correct copy of an email exchange dated February 22, 2017 – March 2, 2017, between myself and someone who only identified herself as “Heather.”

Dated: New York, New York
January 10, 2018


Joshua Kaufman