

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRIDGET BITTMAN,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:14-cv-8191 (JFH) (SEC)
v.	)	
	)	
MEGAN FOX, KEVIN DUJAN, DAN	)	
KLEINMAN, ADAM ANDRZEJEWSKI, and	)	
FOR THE GOOD OF ILLINOIS,	)	
	)	
Defendants.	)	

**DECLARATION OF DAN KLEINMAN**

I, Dan Kleinman, being over 18 years of age, do state and depose the following under oath and penalty of perjury:

1. The facts stated herein are true and based on my personal knowledge.
2. I make this Declaration in support of my motion to dismiss Plaintiff’s Amended Complaint for lack of personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure.
3. I am a resident and citizen of New Jersey.
4. I have never been a resident or citizen of Illinois.
5. I have never visited, lived in, or worked in Illinois.
6. I have never been a party to a lawsuit in Illinois, aside from the above-captioned action.

7. I operate the blog "SafeLibraries" from my home in New Jersey.
8. The SafeLibraries blog is publicly available and accessible via the Internet, available at <http://safelibraries.blogspot.com>.
9. On my blog, SafeLibraries, I publish articles of public interest about libraries located all over the country.
10. The posts on SafeLibraries are not directed toward any particular area.
11. I have never directed a blog post specifically to Illinois or readers in Illinois.
12. I have never directed any activities, let alone tortious activities, towards Illinois or Bridget Bittman.
13. I have never owned, used, or possessed real property in Illinois.
14. I have never conducted business in Illinois or been a party to a contract with any citizen of Illinois.
15. I have never been convicted of a crime in Illinois.
16. I never expected to be sued in Illinois for any reason.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 18, 2015.



Dan Kleinman