

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

FRAGRANCE HARRIS STANFIELD, YAHINA BROWN-MCREYNOLDS, TIARA JOHNSON, SHONNELL HARRIS-TEAGUE, ROSE MARIE WYSOCKI, CURT BAKER, DENNISJANESS BROWN, DANA MOORE, SCHACANA GETER, SHAMIKA MCCOY, RAZZ'ANI MILES, PATRICK PATTERSON, MERCEDES WRIGHT, QUANDRELL PATTERSON, VON HARMON, and NASIR ZINNERMAN, JULIE HARWELL, individually and as parent and natural guardian of L.T., a minor, LAMONT THOMAS, individually and as parent and natural guardian of L.T., a minor, LAROSE PALMER, JEROME BRIDGES, MORRIS VINSON ROBINSON-MCCULLEY, KIM BULLS, CARLTON STEVERSON, and QUINNAE THOMPSON,

Plaintiffs,

-vs-

MEAN LLC; VINTAGE FIREARMS, LLC; RMA ARMAMENT, INC.; ALPHABET INC.; GOOGLE LLC; YOUTUBE, LLC; REDDIT, INC.; PAUL GENDRON; AND PAMELA GENDRON,

Defendants.

ATTORNEY AFFIRMATION OF RICHARD A. GRIMM, III, ESQ. IN SUPPORT OF DEFENDANT REDDIT, INC.'S MOTION TO DISMISS

Index No. 810317/2023

Hon. Paula L. Feroletto

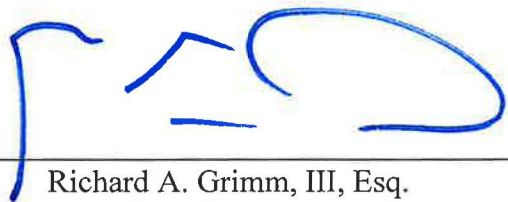
RICHARD A. GRIMM, III, ESQ., an attorney duly admitted to the practice of law in the State of New York, affirms the following under penalty of perjury:

1. I am a partner in the law firm of Magavern Magavern Grimm LLP, and together with Perkins Coie, LLP, we are attorneys for the Defendant, Reddit, Inc. ("Reddit"). As such, I am fully familiar with the facts and circumstances herein.

2. I make this affirmation in support of Reddit's Motion to Dismiss Plaintiff's Complaint (NYSCEF Doc. No. 2), pursuant to CPLR 3211(a)(7), for failure to state a claim.

3. The Court's attention is respectfully directed to the Memorandum of Law accompanying this affirmation for a more extensive review of the relevant case law and doctrines of law addressed herein and which is hereby incorporated by reference.

Dated: Buffalo, New York
November 9, 2023



Richard A. Grimm, III, Esq.

PRINTING SPECIFICATIONS AND WORD COUNT

The undersigned hereby certifies pursuant to 22 NYCRR 202.8-b that the foregoing Affirmation complies with the word count limit; was prepared on a computer using Microsoft Word; and that the word count is 134 words as established using the word count on the word-processing system used to prepare the documents, exclusive of the caption, any table of contents, any table of authorities and signature block.

Dated: November 9, 2023



Richard A. Grimm, III, Esq.

\\21078.0003 \ 1138824