

1 CHRISTOPHER FROST (SBN 200336)
chris@frostllp.com
2 JEFFREY BOGERT (SBN 132778)
jeff@frostllp.com
3 NICK LAUBER (SBN 288499)
Nick@frostllp.com
4 FROST LLP
10960 Wilshire Boulevard, Suite 2100
5 Los Angeles, California 90024
Telephone: (424) 254-0441
6 Facsimile: (424) 600-8504

7 Attorneys for Defendant/Counterclaimant
8 Christian Lanng

9 UNITED STATES DISTRICT COURT
10 CALIFORNIA NORTHERN DISTRICT (OAKLAND)

11 JANE DOE,
12 Plaintiff,
13 vs.
14 TRADESHIFT, INC., et al.
15 Defendant.

Case No. 4:24-cv-00166-JST

Judge Jon S. Tigar

**DECLARATION OF DIANA
SMITH IN SUPPORT OF
DEFENDANT/COUNTER
CLAIMANT CHRISTIAN LANNG'S
OPPOSITION TO ANTI-SLAPP**

Trial Date: None Set

16
17 CHRISTIAN LANNG,
18 Counterclaimant,
19 vs.
20 JANE DOE; BRYAN J. FREEDMAN;
21 MILES COOLEY and FREEDMAN,
22 TAITELMAN, & COOLEY, LLP; and
DOES 1 through 10, inclusive,
23 Counterdefendant.

24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

DECLARATION OF DIANA SMITH

I, Diana Smith, declare as follows:

1. I am not a party to and am financially disinterested in this legal action. I have personal knowledge of the facts set forth herein and, if called upon to testify as a witness, I could and would competently testify to the matters stated herein. I make this Declaration in support of Counterclaimant’s Opposition to Anti-SLAPP.

2. I was in contact with the law firm Freedman, Taitelman + Cooley, LLP in 2023 because they were potentially going to represent me in lawsuit against Lanng.

3. Miles Cooley, an attorney with Freedman, Taitelman, + Cooley, LLP contacted me through a WhatsApp to inform me of a social media campaign directed at Tradeshift, Inc. and Lanng. A true and correct copy of that message is attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 21st, 2024, at 7/21/2024

DocuSigned by:
D Smith
D33A56D1A82A12F

Diana Smith

