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25 *Attorneys for Defendants Automattic Inc. and*  
26 *Matthew Charles Mullenweg*

27 **IN THE UNITED STATES DISTRICT COURT**  
28 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

WPENGINE, INC., a Delaware corporation,  
Plaintiff,

vs.

AUTOMATTIC INC., a Delaware  
corporation; and MATTHEW CHARLES  
MULLENWEG, an individual,

Defendants.

Case No. 3:24-cv-06917-AMO

**DECLARATION OF HADLEY  
DREIBELBIS IN SUPPORT OF  
DEFENDANTS' SURREPLY IN  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

Judge: Hon. Araceli Martinez-Olguin

1 I, Hadley Dreibelbis, declare as follows:

2 1. I am an attorney with the law firm Hogan Lovells US LLP, counsel for Defendants  
3 Automattic Inc. and Matthew Charles Mullenweg (“Defendants”). I make this declaration in  
4 support of Defendants’ Surreply in Opposition to Plaintiff’s Motion for Preliminary Injunction. I  
5 have personal knowledge of the facts stated in this Declaration and would, if called as a witness,  
6 competently testify to those facts.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of an audio-  
8 visual recording of Defendant Matthew Charles Mullenweg’s public interview at TechCrunch  
9 Disrupt 2024 Conference, submitted as Exhibit 2 to the Declaration of Olga Slobodyanyuk in  
10 Support of Plaintiff WPEngine, Inc.’s (“WP Engine”) Reply in Support of Its Motion for  
11 Preliminary Injunction, ECF No. 46-2. Phrases that WP Engine incorporated into its Reply are  
12 highlighted in yellow. Phrases within the same sentence or sentences which were not incorporated  
13 into WP Engine’s Reply are highlighted in blue.

14 I declare under penalty of perjury under the laws of the United States of America and the  
15 State of California that the foregoing is true and correct.

16  
17 Executed on this 21<sup>st</sup> day of November, 2024 in Washington, D.C.

18  
19 */s/ Hadley Dreibelbis*  
20 Hadley Dreibelbis

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**ATTESTATION**

I, Michael M. Maddigan, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Hadley Dreibelbis has concurred in the aforementioned filing.

Dated: November 21, 2024

/s/ Michael M. Maddigan

Michael M. Maddigan