

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

Mr. Michael Moates

Plaintiff

v.

Facebook Inc.

Defendant

Case No.: 4:20-cv-00896

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**DECLARATION OF MICHAEL MOATES**

I, Michael Moates, 26-years-old, make the following statements under penalty of perjury:

1. I have been diagnosed with Asthma, Sleep Apnea, Insomnia, Anxiety, Attention Deficit Hyperactivity Disorder, Depression, and Binge Eating Disorder. (See Exhibit A)
2. I would not be able to use my medical machines while traveling which would put my life at risk.
3. I have been rushed to the emergency room multiple times during the coronavirus pandemic for concern while struggling to breath. (See Exhibit B)
4. I have been diagnosed with pneumonia during the coronavirus pandemic.
5. At one point during the pandemic, they were so concerned with my breathing the physician ordered a chest x-ray.
6. I struggle from a severe cough.
7. I use a BiPAP machine to help me breath.
8. I use a nebulizer and rescue inhaler frequently to help me breath. (See Exhibit A)
9. When I have attempted to wear a mask in the past I have struggled to breath and started coughing to the point where my face was purple.
10. During Asthma attacks I have panic attacks which make symptoms worse. (See Exhibit A)
11. I have severe anxiety about traveling during a pandemic.
12. I assert that the Defendants did not consult with me regarding any contracts and in my opinion created an inequality of bargaining power.

I declare under penalty of perjury that the foregoing is true and correct. Signed 2 March 2021.



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Michael Moates