

1 Jeffrey J. Pyle (*pro hac vice pending*)
2 Aaron S. Jacobs (Cal. Bar No. 214953)
3 PRINCE LOBEL TYE LLP
4 One International Place, Suite 3700
5 Boston, MA 02110
6 tel. (617) 456-8000
7 fax (617) 456-8100

8 Matthew Vella (Cal. Bar No. 314548)
9 PRINCE LOBEL TYE LLP
10 357 S Coast Highway, Suite 200
11 Laguna Beach, CA 92651
12 tel. (949) 232-6375
13 fax (949) 861-9133

14 Attorneys for Defendant Matthew J. Weymouth

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 MATTHEW HOGAN,
19 Plaintiff,
20 v.

21 MATTHEW J. WEYMOUTH,
22 PATRICK C. CHUNG,
23 PRO SPORTORITY (ISRAEL) LTD.,
24 KARL RASMUSSEN,
25 BEASLEY BROADCAST GROUP
26 INC., MELISSA EANNUZZO, and
27 DOES 1-10,

28 Defendants.

No. 2:19-cv-02306-MWF-AFMx

**DECLARATION OF PATRICK
CHUNG IN SUPPORT OF MOTION
TO DISMISS**

Date: September 9, 2019
Time: 10:00 a.m.
Location: Courtroom 5A
Judge: Michael W. Fitzgerald

DECLARATION OF PATRICK CHUNG

I, Patrick Chung, declare:

1. I am over the age of 18. The matters stated in this declaration are true of my own personal knowledge. If called as a witness, I could and would competently testify to these matters.

2. I am a resident of Foxborough, Massachusetts. I am a professional football player for the New England Patriots.

3. I have known Matthew Weymouth socially since approximately May of 2009. Weymouth and I are friends.

4. On or about February 5, 2019, Weymouth provided me with screenshots of a text exchange he told me that he had had with Matthew Hogan, an employee of the Los Angeles Rams. On February 6, 2019, I posted those screenshots to my Facebook and Instagram pages, with a comment that I wrote to accompany them.

5. Weymouth did not compose, edit, or upload the February 6 posts. Weymouth has never posted content to my social media accounts. He does not have access to my social media accounts, and he has never managed my social media accounts for me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on this 2nd day of August, 2019, in Foxborough, Massachusetts.



Patrick Chung