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11
12 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
13 **OAKLAND DIVISION**

14 PETER TODD, an individual,

15 Plaintiff,

16 vs.

17 SARAH MICHELLE REICHWEIN aka ISIS
18 AGORA LOVECRUFT, an individual,

19 Defendant.
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Case No.: 4:19-cv-01751-DMR

**DECLARATION OF JANE DOE IN
SUPPORT OF SPECIAL MOTION TO
STRIKE, OR, ALTERNATIVELY,
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

1 I, “Jane Doe,” hereby declare:

2 1. I am a female, adult individual, age 24. “Jane Doe” is a pseudonym. I do not
3 want to use my real name, because the events I am describing have caused me extreme emotional
4 trauma, and I am afraid that identification and exposure could subject me to more of the same.
5 For this reason, I also implore the plaintiff, Peter Todd, in the civil action known as *Todd v.*
6 *Lovecraft*, No. 3:19-cv-01751 (filed in the United States District Court for the Northern District
7 of California), his attorneys, and their agents, not to divulge my name, in court filings or
8 otherwise.

9 2. On or about February 10, 2018, I was speaking to a friend, Zooko, when the
10 subject of predatory sexual behavior by men in computer tech, my field, arose. Based on that
11 conversation, Zooko put me in touch with Isis Lovecraft, with whom I was familiar but not
12 acquainted.

13 3. On or about February 15, 2018, Isis and I began to communicate. In the course of
14 those communications, I informed Isis that I was raped by Peter Todd in May 2017.
15 Specifically, I told Isis, in substance, all of the following:

- 16 a. While I was studying abroad in [REDACTED], I invited Peter Todd, whom
17 I then considered a friend, to visit me, since he was passing through Germany at
18 the time.
- 19 b. On the day of Mr. Todd’s arrival, I was sleep deprived, having a taken a midterm
20 that day. I have a neurological sleep disorder which causes me to have ‘sleep
21 attacks,’ during and after which I experience such symptoms as cognitive deficits
22 and temporary paralysis.
- 23 c. As we walked around, I felt an attack coming on. I told Mr. Todd all the
24 symptoms he could expect to see.
- 25 d. Then my legs buckled in the street and Mr. Todd helped me back up. He
26 expressed concern and said that we should get me to the nearest hotel room where
27 I could sleep and wait out the symptoms. Since I was not near home, I agreed.
28

- 1 e. When we got to Mr. Todd's hotel room, I tried to sleep on the couch so I didn't
2 give him any wrong signals, but he physically crowded me and badgered me into
3 sleeping in his bed. He then got into bed with me.
4
5 f. I fell asleep and woke up, still under the effects of the attack.
6
7 g. We then went to dinner, where Mr. Todd tried to impress me with his influence,
8 connections, and money, telling me he could offer me a job.
9
10 h. After dinner, I went back to Mr. Todd's room with him, feeling a sense of
11 obligation to hang out with him a little longer because he had paid for dinner.
12
13 i. Mr. Todd started asking me about my midterm while pushing physical
14 boundaries. I tried to leave three or four times, announcing each time that I
15 should leave, but each time, he pulled me down onto his lap.
16
17 j. I gave up resisting. Realizing I couldn't leave, I just thought, 'this is the way
18 things will go.' I consider what happened next rape, and told Isis so.
19
20 k. Afterward, I locked myself in the hotel bathroom and sobbed for three or four
21 hours. At about 5:00 am, I left and walked home, crying the whole way.
22
23 4. Later that day or soon thereafter, Mr. Todd messaged me saying he had slept well
24 and asking if I had. I did not respond. I have not interacted with Mr. Todd since that night in
25 May 2017.
26
27 5. Again, I implore anyone who is made aware of the contents of this declaration to
28 preserve my anonymity.
6. Although "Jane Doe" is a pseudonym, I am signing this declaration below in my
own hand.

1 I swear under penalty of perjury that the foregoing is true and correct.

2
3 Dated: July 14, 2019



Jane Doe