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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In the Matter of the Summons Number) Case No. 26-mc-80074
OPR-DC-2026-032216-001:)

J DOE,) **DECLARATION OF J DOE IN**
Movant,) **SUPPORT OF MOTION TO QUASH**
) **SUMMONS**

vs.)

THE UNITED STATES) **DATE:** To Be Determined
DEPARTMENT OF HOMELAND) **TIME:** To Be Determined
SECURITY,)
Respondent.)

I, J DOE, an individual whose rights and interests are implicated by the
Summons at issue in this matter declare the following:

1. I am a citizen of the United States, and a resident of the State of Oregon.
2. I am associated with the Reddit account Tired_Thumb.
3. I use this account to post about events and issues local to my region of Oregon and beyond. I regularly engage in political speech, both in my direct posts as well as in the comment threads of others posts I access using Reddit. I utilize this account to engage in political speech through direct posts, as well as dialogue with community members in comment threads associated with my own

1 and others' posts. Reddit allows users to post and engage on the service without
2 publicly disclosing their legal identity. Like many other users on the site, I use
3 Reddit to converse anonymously.

4
5 4. Neither I nor my Reddit account are associated with importing or
6 exporting any merchandise or any other thing subject to tax or duty into or out of
7 the United States. I have not traveled out of the country, I'm not engaged in any
8 international commerce, and I have no business interests outside the United
9 States. I have not sold or purchased any merchandise of any kind that would
10 cross a United States Border or be subject to any customs tax, duty or fee.
11

12 5. On March 6, 2026, I received a notification from Reddit notifying me
13 that Reddit had received a law enforcement request related to my Tired_Thumb
14 Reddit account.
15

16 6. I responded to this notice with a request for more information as
17 prompted, and I was provided a redacted copy of a Summons produced by the
18 Department of Homeland Security seeking records related to the Tired_Thumb
19 account. Exhibit A.
20

21 7. Subsequent to my receipt of the redacted Summons, I sought out
22 and retained counsel.

23 I declare under penalty of perjury under the laws of the State of California
24 that the foregoing is true and correct.
25

26 Dated: March 12, 2026.

27 By: /s/ J Doe
28 J Doe