

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER  
LTD.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE  
LIBRARY GENESIS PROJECT d/b/a  
LIBGEN.ORG, ALEXANDRA ELBAKYAN,  
JOHN DOES 1-99,

Defendants.

Index No. 15-cv-4282 (RWS)

**DECLARATION OF JOSEPH V. DEMARCO IN SUPPORT OF PLAINTIFFS’  
APPLICATION FOR A PRELIMINARY INJUNCTION**

I, JOSEPH V. DEMARCO, declare as follows is true and correct:

1. I submit this affidavit in support of Plaintiffs’ application for an order authorizing alternative service of process on defendants and entry of a preliminary injunction.
2. I am a member of the Bar of this Court and a partner of the law firm of DeVore & DeMarco LLP, attorneys for plaintiffs Elsevier Inc., Elsevier B.V., and Elsevier Ltd. (together the “Plaintiffs” or “Elsevier”) in this above-referenced matter. My office address is 99 Park Avenue, Suite 1100, New York, New York, 10016.
3. Attached hereto as Exhibit A is a true and correct copy of an article posted to the torrentfreak.com website on June 27, 2015, entitled “*Sci-Hub Tears Down Academia’s ‘Illegal’*”

*Copyright Paywalls*,” available at <https://torrentfreak.com/sci-hub-tears-down-academias-illegal-copyright-paywalls-150627/>

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

Dated July 7, 2015

  
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Joseph V. DeMarco