

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



LOLCOW, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:26-cv-2059
)	
ZHEN ELIZABETH FONG-JONES,)	
)	
Defendant.)	

DECLARATION OF THOMAS HAHN

NOW COMES Thomas Hahn, and declares as follows:

1. I am an adult resident, citizen, and domiciliary of the United States. I am competent to testify to the matters set forth herein based upon my personal knowledge.
2. I am acquainted with Liz-Fong Jones. My knowledge of Fong-Jones arises because we work in the same or similar field (technology and software development).
3. Fong-Jones has retained the law firm of Kamerman, Uncyk, Soniker & Klein P.C. and that firm has sent me correspondence threatening litigation arising from what Fong-Jones asserts are posts made by me on the website www.kiwifarms.st.
4. The aforementioned posts do not involve any material ostensibly connected by copyright. Instead, Fong-Jones has threatened me solely due to written commentary on the aforementioned website.
5. The aforementioned written commentary is not associated with my name or address. But Fong-Jones has attempted to "doxx" me using my name and address, and has accused me of writing negative commentary regarding Fong-Jones on the Internet.
6. Based on my familiarity with Fong-Jones, and with the website www.kiwifarms.st, and Fong-Jones expressed hostility towards that website, as well as the fact that Fong-Jones seeks to doxx me and has retained counsel to threaten me with litigation based upon anonymous speech that is critical of Fong-Jones and not in any way publicly associated with me, I believe that Fong-Jones motive in seeking personally identifying information associated with accounts on www.kiwifarms.st is not related to any claim of copyright, but is an attempt to eliminate critical speech from the internet or to publicly doxx individuals

TH

that Fong-Jones believes are associated with a particular website that hosts critical commentary.

7. Further I say nothing.

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

Executed on 06/04/2026

A handwritten signature in blue ink, appearing to read "Thomas Hahn", written over a horizontal line.

Thomas Hahn