

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

DECLARATION OF JOAN S. PETERS PURSUANT TO 28 U.S.C. § 1746

I, Joan S. Peters, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above captioned action. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I am submitting this declaration in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment (ECF No. 210).

3. Attached hereto as Exhibit A is a true and correct (redacted) copy of the Declaration of Abbymc, dated April 30, 2026. The exhibit attached to the Declaration of Abbymc is a true and correct copy of the screenshot that Abbymc provided, as redacted by her. That same screenshot was submitted at ECF 86-1, but was further redacted by counsel.

4. Defendant produced documents through discovery that I have reviewed. Defendant produced different chat threads between him and Abbymc and related attachments in documents

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with the date stamps of SB0000005 to SB000398. The documents produced by Defendant evidence that he and Abbymc exchanged Discord messages from March 2023 through May 2025.

5. Attached hereto as Exhibit B is a true and correct copy of Jesus Peña's Expert Report that was provided to counsel for Defendant on October 16, 2025 in accordance with the Court's Scheduling Order, ECF No. 23.

6. Attached hereto as Exhibit C is a true and correct (redacted) copy of the cited excerpts from the deposition transcript of Defendant Bonnell, on April 19, 2026.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and understanding, the foregoing is true and correct.

Executed in Naples, Florida, this 8th day of May, 2026.

s/ Joan Schlump Peters

Joan Schlump Peters