

Exhibit 2

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
10

11 J. DOE, M. ROE,
12 Plaintiffs,
13 v.
14 COUNTY OF SAN BENITO,
15 Defendant.
16

Case No. 5:25-cv-10237

**DECLARATION OF PLAINTIFF M. ROE
IN SUPPORT OF MOTION TO QUASH
ADMINISTRATIVE SUBPOENA AND
GRANT TEMPORARY RESTRAINING
ORDER**

17 I, M. Roe, declare as follows.

18 1. I am an individual over 18 years of age and one of the Plaintiffs in this action. I can
19 testify to the following matters from personal knowledge. I reside in San Benito County.

20 2. For the reasons explained below, I make this declaration under the pseudonym of
21 M. Roe to protect my privacy and anonymity.

22 3. I am one of the anonymous authors and publishers of Benito Beet Beat, a satirical
23 news outlet published at <https://www.facebook.com/BenitoBeetBeat/>.

24 4. Benito Beet Beat is published anonymously because I wish to keep the material
25 posted on it separate from my personal and professional life. Given that the content published on
26 Benito Beet Beat can be seen as provocative or offensive to powerful people or entities in San
27 Benito County, I am very concerned that others or I would experience retaliation or ostracism in
28 the form of financial loss or otherwise if my identity as an author and publisher of Benito Beet

1 Beat were revealed. These concerns are especially strong given that San Benito County is a rural
2 area with less than 65,000 people.

3 5. On or about November 3, 2025, Benito Beet Beat published a political cartoon
4 satirizing potential cuts to security staff in the County's behavioral health clinic ("Cartoon").

5 6. Supervisor Velazquez, Supervisor Dom Zanger, and Supervisor Kollin Kosmicki
6 each posted a copy of the Cartoon on Facebook. Supervisors Velazquez and Zanger each posted it
7 once, and Supervisor Kosmicki posted it four times on different pages.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct.

10 Dated: November 25, 2025

11 /s/ M. Roe

M. Roe