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BARBRA STREISAND

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 BARBRA STREISAND, an individual,
12 Plaintiff,

13 vs.

14 KENNETH ADELMAN, an individual;
15 PICTOPIA.COM, a California corporation;
16 LAYER42.NET, a California corporation;
and DOE 1 through DOE 20, inclusive.

17 Defendants.

CASE NO. SC 077257

[Honorable Allan J. Goodman]

**DECLARATION OF BARBRA
STREISAND IN SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

**[Filed Concurrently with Motion;
Declaration of John M. Gatti in support
thereof; [Proposed] Order].**

Date: July 14, 2003

Time: 8:30 a.m.

Dept.: H

Motion Cut-Off: None

Discovery Cut-Off: None

Trial Date: None Set

1 **DECLARATION OF BARBRA STREISAND**

2 I, Barbra Streisand, declare as follows:

3 1. I have personal knowledge of the facts set forth in this Declaration. If called as a
4 witness, I could and would testify competently to such facts under oath.

5 2. I own a plot of land located within the City of Malibu on which my primary place
6 of residence is situated. This property is secluded and shielded from public view by a large gate
7 and a perimeter fence with tall foliage on the front side, and steep cliffs overlooking the beach on
8 the back side. The property is located between two adjoining private properties. The property
9 line separating my property from these two adjoining private properties is covered with plants and
10 thick shrubbery on either side which prevents anyone from being able to see inside my property.
11 I purchased this property after a search that lasted many years because the property was ideally
12 situated to safeguard my privacy and my safety.

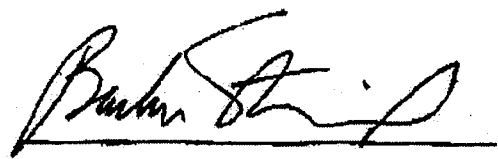
13 3. Throughout my life I have been the constant target of paparazzi and others who
14 have sought to catch a glimpse of me or take photographs of me, or anything associated with me.
15 These individuals hang around places where they believe I will be and then harass me when I
16 approach. I have also had serious problems with various stalkers who have threatened my
17 physical well-being.

18 4. Because of these concerns regarding my privacy and personal safety, I have taken
19 steps to shield my private affairs from public view as much as possible. I purchased my current
20 residence for exactly those reasons. Also, my phone number is unlisted. Furthermore, the
21 records of the property I own do not show me as the owner, and the owner listed will not enable
22 anyone to trace that owner back to me with any certainty.

23 5. When I found out about the photographs being disseminated on the internet on the
24 website www.californiacoastline.org I became very concerned. In light of the experience that I
25 have had with paparazzi, stalkers, and the like, I feel that the mere posting of these pictures
26 without my consent on the internet has violated my privacy. I am also anxious that anyone who
27 would be so inclined, will use the information posted on the website to threaten my personal
28 safety.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on the 16th of May 2003, at Malibu, California.



Barbra Streisand