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COPYRIGHT CLAIMS BOARD

GAVIN O'NEILL Claimant, - against – SABRINA CARROLL d/b/a SKY LOUNGE SKIN CARE Respondent.	Case No.: 23-CCB-0381 **SECOND DECLARATION OF TARYN R. MURRAY**

I, Taryn R. Murray, declare as follows:

1. I am over the age of 18 years old. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto.

2. I represent Gavin O'Neill ("O'Neill").

3. Respondent Carroll is the sole owner, operator, and manager of Sky Lounge Skin Care.

4. Respondent Carroll is an individual residing in the state of Maryland.

5. Respondent Carroll is the owner, operator, and manager of a Facebook page "Sky Lounge Skin Care, LLC", which promotes Respondent's business ("Respondent's Facebook"). *See* https://www.facebook.com/SkyLoungeSkinCare.

6. Respondent's Facebook, where the infringement of O'Neill's photograph took place, clearly states "Sabrina Carroll is the sole owner and founder of Sky

Lounge Skin Care."

7. Attached hereto as Exhibit D is a true and correct screenshot of Respondent's Facebook

8. Upon information and belief, as the "sole owner and founder" of Sky Lounge Skin Care, Sabrina Carroll is solely responsible for the content placed on Respondent's Facebook.

9. As the owner, manager, and operator of Respondent's Facebook, Carroll is responsible for placing O'Neill's Beauty Photograph on Respondent's Facebook.

10. Further, Respondent Carroll has a personal Facebook page located at https://www.facebook.com/queenofwaxing/ ("Respondent's Personal Facebook Page").

11. Respondent's Personal Facebook Page links directly to Respondent's Facebook multiple times, further indicating that Respondent Carroll is responsible for the content placed on Respondent's Facebook.

12. Attached hereto as Exhibit E are true and correct screenshots of Respondent's Personal Facebook Page.

13. Additionally, Respondent's Website www.skyloungeskincare.com, also indicates Carroll "is the founder of Sky Lounge Skin Care".

14. Attached hereto as Exhibit F is a true and correct screenshot of Respondent's Website.

15. Respondent provides a link for customers to book appointments for her services at https://booking.mangomint.com/skyloungeskincarellc. ("Booking Website").

16. According to the Booking Website, the only staff member available when a user attempts to book an appointment with Sky Lounge Skin Care is Respondent Carroll.

17. O'Neill provided two licenses as Exhibit G and Exhibit H. *See* Dkt. #17.

18. The license in Exhibit G has only been redacted of the client name and the client's banking information. This information should not be relevant to an assessment of damages as Claimant has provided a description of the client and all of the details pertaining to the parameters of the license are not redacted.

19. The license in Exhibit H has been redacted of the client name and the client's banking information. The additional redactions cover images that are not owned by O'Neill. Like Exhibit H, information should not be relevant to an assessment of damages as Claimant has provided a description of the client and all of the details pertaining to the parameters of the license are not redacted.

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

DATED: August 20, 2024 Respectfully submitted,

Queens, New York

/s/ Taryn R. Murray
Taryn R. Murray, Esq.
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Proof of Delivery

I hereby certify that on Tuesday, August 20, 2024, I provided a true and correct copy of the Second Witness Statement - Taryn Murray to the following:

Sabrina Carroll, represented by Sabrina Carroll, served via MANUALEEMAIL

Signed: /s/ Taryn R. Murray