

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MANUEL VON RIBBECK,

Plaintiff,

v.

CHRISTINE NEGRONI,

Defendant.

Case No. 19-cv-1205

Honorable John Robert Blakey

Magistrate Judge Mary M. Rowland

AFFIDAVIT OF CHRISTINE NEGRONI

I, Christine Negroni, on oath, state as follows:

1. I am an adult over the age of 18, competent to testify and have personal knowledge of the facts set forth herein.
2. I submit this Affidavit in support of the accompanying Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction.
3. I am a Connecticut resident and reside at 26 Highview Avenue, Old Greenwich, CT 06870. I hold a Connecticut driver's license. I have lived and worked in Connecticut since 1993.
4. I do not own or rent real estate in Illinois, and I have not resided in Illinois since 1993. I have not worked in Illinois since 1990, and I have not been employed by a company based in Illinois since 1988. I did write a freelance article for the *Chicago Tribune* more than two years ago, but that article had nothing to do with Mr. von Ribbeck.
5. To my best recollection, I have not been in the State of Illinois for any substantial time since 1993. My longest span of time was a three-day visit three years ago in the company of

my husband and three of my children. I have passed through O'Hare International Airport on occasion en route to other destinations.

6. I conduct my research and writing in Connecticut where I work and reside. I do not conduct business in the State of Illinois.

7. With regard to the blog post at issue in this case (the "Post"), I drafted the Post while located in Connecticut. I researched the Post while located in Connecticut, including calling and emailing sources for the Post from Connecticut.

8. I edited the Post in Connecticut, and I uploaded the Post from a computer located in Connecticut.

9. In my blog, I write about aviation news and events around the world. I do not specifically market my blog (or the Post) in Illinois, and I do not specifically target Illinois residents with the blog (or the Post). At the time I wrote the Post I had been advised by an attorney that Mr. von Ribbeck no longer lived or practiced law in Illinois. After speaking with the attorney, I believed Mr. von Ribbeck was located in Peru. I now understand that he claims in this lawsuit to live in Illinois.

10. I tweeted regarding the Post on December 17 and 18, 2018. In those Tweets, I included hashtags for Chicago and Jason Meisner (the *Chicago Tribune* reporter who covers federal courts in Chicago).

11. I use hashtags in my Tweets to highlight terms I believe are relevant to the posts about which I am tweeting. I included #chicago in Tweets on December 17 and December, 2018 because at least one Lion Air case had already been filed in Chicago, and I believed others would likely be filed in Chicago.

12. I included the Jason Meisner hashtag simply as an acknowledgment of a newspaper reporter working the story, just as I have hashtagged other reporters in other Tweets.

13. My Tweets on January 18 and 21, 2019 concern a different blog post about Mr. von Ribbeck—a post from January 18, 2019 that I understand is not the subject of the claims in this case.

14. I do not sell goods or services through my blog, and, accordingly, I have not used it to sell goods or services to Illinois residents.

15. When I wrote the Post, I had the Miami Beach police reports and certain records from the civil suit for sexual battery and assault. When I wrote it I did not and I do not now believe anything in the Post was false. To the contrary, when I wrote the Post I believed the facts, and my understanding of the facts, were accurate.

16. The document attached as Exhibit 1 to the Second Amended Complaint is a true and correct copy of the Post.

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

Executed on this 15th day of May, 2019.


Christine Negroni