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15	UNITED STATES DISTRICT COURT				
16	CENTRAL DISTRICT OF CALIFORNIA				
17	WESTERN DIVISION				
18	SEAN HALL, etc., e	t al.,) Case No. 2	:17-cv-0688	32 MWF (ASx)
19	Plaintiff	Ś,))		
20	VS.		DECLARA	TION OF T	AYLOR SWIFT
21	TAYLOR SWIFT, et	tc., et al.,) IN SUPPORT OF DEFENDANTS') SECOND MOTION FOR SUMMARY		
22	Defenda	ints.) JUDGMEN)	N I	
23) Date: Septe	ember 19, 202 0 a.m.	22
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25				pom of the H	
26			Mic United	hael W. Fitzg States Distri	gerald ct Judge
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DECLARATION OF TAYLOR SWIFT

I, Taylor Swift, declare and state:

I am over the age of 18 and have personal knowledge of the following
 facts and could competently testify to these facts if called upon to do so.

2. I am a professional singer, songwriter, and recording artist. Since
beginning my recording career, I have released eleven studio albums (including two
re-recorded albums) and am honored to have won eleven GRAMMY Awards, an
Emmy Award, thirty-four American Music Awards and twenty-nine Billboard
Awards, among others.

10 3. I was born on December 13, 1989, in West Reading, Pennsylvania. My 11 family and I lived in Shillington, Pennsylvania, on a working Christmas Tree Farm in 12 a farmhouse. When I was approximately ten years old, my family moved to a rental 13 house nearby in Wyomissing Hills in Berks County, Pennsylvania, and I was enrolled 14 for fourth grade at Wyomissing Hills Elementary school. I sang all the time as a child and became involved in children's theatre when I was eight years old. I was 15 approximately twelve when I began to write songs and took guitar lessons, and 16 17 dreamed of becoming a country music songwriter. I lived in Berks County until 2004, when I moved with my family to Hendersonville, Tennessee, to pursue a country 18 music career in nearby Nashville. I attended Hendersonville High School for a year 19 and a half and then switched to home schooling to accommodate my touring and 20 21 recording schedule.

4. While living in the Shillington and Wyomissing area, I listened to country music almost exclusively, and at the time my biggest influences were country artists like Shania Twain, LeeAnn Rimes, Faith Hill, The Dixie Chicks (now known as The Chicks), Tim McGraw, and many others. In my house, we played CDs and rarely played the radio. I do not recall listening to any specific radio stations during that time, but when I listened to radio it was generally country music. I did not watch the MTV show TRL, and I did not go to clubs during this time. The only concerts I went to were for country and folk rock singers, LeAnn Rimes, Billy Gilman and
 Melissa Etheridge. My parents limited what I could watch and listen to, and did not
 permit me to watch TRL until I was about 13 years old.

5. My first album, *Taylor Swift*, was recorded in Nashville in 2005 and
released in 2006. It consists solely of country music and includes my first hit single, *Tim McGraw*. As my career developed, I began incorporating elements of other
musical genres, including pop, into my music.

8 6. Shake It Off is an up-tempo pop song and is the lead single off my fifth
9 studio album, 1989. It was released as a single in August 2014 and was included on
10 the album 1989, released in October 2014.

7. I co-wrote Shake It Off with Karl Martin Sandberg, professionally known 11 as Max Martin, and Karl Johan Schuster, professionally known as Shellback, at 12 Conway Recording Studios in Los Angeles, in February 2014. We began writing the 13 song after I discussed with Max Martin and Shellback that I wanted to write a song 14 that would help me cope with stresses in my life, and would also double as a song that 15 would make people get up and dance. With that in mind, Shellback created a drum 16 beat and Max Martin, Shellback, and I began collaboratively improvising musical 17 lines to the drum beat. I started improvising lyrics to the music, including lyrics on 18 the idea of "shaking," both in the sense of shaking something off and shaking in terms 19 of dancing. 20

21 8. The lyrics to Shake It Off were written entirely by me. A true and correct copy of the lyrics to Shake It Off is attached to this Declaration as Exhibit 116. Shake 22 It Off is about independence and "shaking off" negative personal criticism through 23 music and dance. In writing the lyrics, I drew partly on experiences in my life and, in 24 particular, unrelenting public scrutiny of my personal life, "clickbait" reporting, 25 public manipulation, and other forms of negative personal criticism which I learned I 26 just needed to shake off and focus on my music. With Shake It Off, I wanted to provide 27 28 a comedic, empowering approach to helping people feel better about negative

criticism through music, dance, and the personal independence enabling one to just 1 2 shake off the negative criticism.

The lyrics to Shake It Off also draw from commonly used phrases and 9. 3 comments heard throughout my life. Prior to writing Shake It Off, I had heard the 4 phrases "players gonna play" and "haters gonna hate" uttered countless times to 5 express the idea that one can or should shrug off negativity. I recall hearing phrases 6 about players play and haters hate stated together by other children while attending 7 school in Wyomissing Hills, and in high school in Hendersonville. These phrases 8 were akin to other commonly used sayings like "don't hate the playa, hate the game," 9 "take a chill pill," and "say it, don't spray it." I drew on those commonly used player 10 and hater phrases in creating the lyrics "Cause the players gonna play, play, play, play, 11 play / And the haters gonna hate, hate, hate, hate, hate." 12

13 10. I also recall hearing similar player and hater phrases in many songs, films, and other works prior to Shake It Off. For example, I was present at the 2013 14 15 Country Music Awards and heard Eric Church perform his song *The Outsiders*, which includes the lyric "the player's gonna play and a haters gonna hate". 16

17 11. In 2013, approximately a year before I wrote the lyrics to Shake It Off, I performed at the Billboard Music Awards wearing a bodysuit that incorporated a t-18 shirt emblazoned with the phrase "haters gonna hate." A true and correct copy of that 19 t-shirt is attached to this Declaration as Exhibit 117. The t-shirt was purchased from a store, Urban Outfitters. I wore that bodysuit for my performance at the Billboard Music Awards because I was struck by messages that people prone to doing something will do it, and the best way to overcome it is to shrug it off and keep living.

24 12. I was reminded of these phrases when I began working on Shake It Off with Max Martin and Shellback in the studio. I included versions of the players play and haters hate phrases in Shake It Off because, as they express resistance to negativity, they further Shake It Off's message of independence and "shaking off"

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criticism. I also included these phrases because, musically, they worked well over the 1 beat that we had created. 2

The phrases "Heartbreakers gonna break, break, break, break, break, / 13. 3 And the fakers gonna fake, fake, fake, fake, fake" were included because they also fit 4 the beat of the song, they loosely rhymed with my versions of player and hater phrases 5 discussed above, and because they represented other forms of negativity that a person 6 can "shake off" through music and dance.

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Until learning about Plaintiffs' claim in 2017, I had never heard the song 14. 8 Playas Gon' Play and had never heard of that song or the group 3LW. None of the 9 CDs I listened to as a child, or after that, were by 3LW. I have never heard the song 10 Playas Gon' Play on the radio, on television, or in any film. The first time I ever 11 heard the song was after this claim was made. I have never seen a Playas Gon' Play 12 music video, never attended any concert where 3LW performed, and never attended 13 any concert where the song Playas Gon' Play was performed. I do not own any 3LW 14 albums or singles, or any recording of Playas Gon' Play. I do not own and have 15 never listened to the albums Now That's What I Call Music! 6 or Now That's What I 16 Call Music! 7. I did not discuss Playas Gon' Play or 3LW with anyone prior to this 17 lawsuit. I have never subscribed to Billboard magazine and had never read anything 18 in the magazine until after I moved to Nashville and became immersed in the music 19 business.

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I do not recall ever meeting Sean Hall or Nathan Butler. 15.

I can and do confirm that Shake It Off was composed independently of 22 16. 23 Playas Gon' Play.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 6, 2022.

TAYLOR-SWIFT

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