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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 AIRBNB, INC.,

18 Plaintiff,

19 vs.

20 CITY AND COUNTY OF SAN
FRANCISCO,

21 Defendant.
22

Case No. 16-cv-03615

**DECLARATION OF JONATHAN H.
BLAVIN IN SUPPORT OF AIRBNB,
INC.'S MOTION FOR PRELIMINARY
INJUNCTION**

1 I, Jonathan H. Blavin, declare as follows:

2 1. I am an attorney licensed in the State of California and admitted to practice before
3 this Court. I am counsel for Plaintiff Airbnb, Inc. in the above captioned matter. I have personal
4 knowledge of the facts set forth below, and could testify competently to those facts if called to do
5 so.

6 2. Attached hereto as Exhibit A is a true and correct copy of an article written by
7 Caleb Pershan entitled “Campos Proposes Law to Fine Airbnb Directly for Unregistered SF
8 Listings,” published on April 25, 2016. The article is available online at
9 http://sfist.com/2016/04/25/campos_proposes_legislation_to_hold.php.

10 3. Attached hereto as Exhibit B is a true and correct copy of a Facebook post by
11 Supervisor Aaron Peskin, dated April 25, 2016. The post is available online at
12 [https://www.facebook.com/aaron.peskin/posts/1607597332893162?comment_id=1607725679546](https://www.facebook.com/aaron.peskin/posts/1607597332893162?comment_id=1607725679546994&comment_tracking=%7B%22tn%22%3A%22R0%22%7D)
13 [994&comment_tracking=%7B%22tn%22%3A%22R0%22%7D](https://www.facebook.com/aaron.peskin/posts/1607597332893162?comment_id=1607725679546994&comment_tracking=%7B%22tn%22%3A%22R0%22%7D).

14 4. Attached hereto as Exhibit C is a true and correct copy of a press release from the
15 office of Supervisor David Campos announcing “Legislation Holding Airbnb Accountable for
16 Listing Illegal Short Term Rentals.” It was published to Facebook by the SF Bay Times on April
17 25, 2016. The press release is available online at
18 <https://www.facebook.com/SanFranciscoBayTimes/posts/1188030017882628>.

19 5. Attached hereto as Exhibit D is a true and correct copy of an article written by
20 Emily Green entitled “SF Supes Crack Down on Unregistered Short-Term Rentals,” published on
21 June 7, 2016. The article is available online at [http://www.sfgate.com/politics/article/Supervisors-](http://www.sfgate.com/politics/article/Supervisors-No-unregistered-hosts-on-short-term-7969444.php)
22 [No-unregistered-hosts-on-short-term-7969444.php](http://www.sfgate.com/politics/article/Supervisors-No-unregistered-hosts-on-short-term-7969444.php).

23 6. Attached hereto as Exhibit E is a true and correct copy of a transcript produced by
24 Munger, Tolles & Olson staff of a June 2, 2016 hearing of the San Francisco Board of Supervisors
25 Government Audit and Oversight Committee. Video of the hearing is available online at
26 <http://goo.gl/PhCCsI>. The relevant portion of the video begins at 8:48.

27 7. Attached hereto as Exhibit F is a true and correct copy of a report from the City and
28 County of San Francisco Board of Supervisors Budget and Legislative Analyst’s Office entitled

1 “Short-Term Rentals 2016 Update,” dated April 7, 2016. The report is available online at
2 <http://www.sfbos.org/Modules/ShowDocument.aspx?documentid=55575>.

3 8. Attached hereto as Exhibit G is a true and correct copy of a Facebook post by
4 Supervisor David Campos, dated April 25, 2016. The post is available online at
5 <https://www.facebook.com/davidcampossf/posts/1190086794337275>.

6 9. Attached hereto as Exhibit H is a true and correct copy of an article written by the
7 Bay City News Service entitled “New Legislation Would Fine Airbnb for Listing Unregistered
8 Properties,” published on April 25, 2016. The article is available online at
9 [http://www.sfgate.com/news/bayarea/article/New-Legislation-Would-Fine-Airbnb-For-Listing-](http://www.sfgate.com/news/bayarea/article/New-Legislation-Would-Fine-Airbnb-For-Listing-7352453.php)
10 [7352453.php](http://www.sfgate.com/news/bayarea/article/New-Legislation-Would-Fine-Airbnb-For-Listing-7352453.php).

11 10. Attached hereto as Exhibit I is a true and correct copy of a transcript produced by
12 Munger, Tolles & Olson staff of a June 7, 2016 hearing of the San Francisco Board of
13 Supervisors. Video of the hearing is available online at <http://goo.gl/FWvIZw>. The relevant
14 portion of the video begins at 43:00.

15 11. Attached hereto as Exhibit J is a true and correct copy of a white paper written by
16 the San Francisco Bay Area Planning and Urban Research Association entitled “Non-Primary
17 Residences and San Francisco’s Housing Market,” published on October 21, 2014. The white
18 paper is available online at [http://www.spur.org/sites/default/files/publications_pdfs/SPUR_Non-](http://www.spur.org/sites/default/files/publications_pdfs/SPUR_Non-Primary_Residences.pdf)
19 [Primary_Residences.pdf](http://www.spur.org/sites/default/files/publications_pdfs/SPUR_Non-Primary_Residences.pdf).

20 12. Attached hereto as Exhibit K is a true and copy of an article written by Vic Lee
21 entitled “San Francisco Supes Going After Airbnb, Other Short-Term Rentals,” published on April
22 25, 2016. The article is available online at [http://abc7news.com/realestate/sf-supes-going-after-](http://abc7news.com/realestate/sf-supes-going-after-airbnb-other-short-term-rentals/1308845/)
23 [airbnb-other-short-term-rentals/1308845/](http://abc7news.com/realestate/sf-supes-going-after-airbnb-other-short-term-rentals/1308845/).

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

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4 Executed on June 27, 2016, in San Francisco, California.

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6 /s/ Jonathan H. Blavin
Jonathan H. Blavin

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