

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

)	
JANET JENKINS, et al.,)	
)	
Plaintiffs,)	Docket No. 2:12-cv-00184
)	
v.)	
)	
KENNETH L. MILLER, et al.,)	
)	
Defendants.)	
)	

**DECLARATION OF ROGER K. GANNAM IN OPPOSITION TO
PLAINTIFF’S MOTION TO COMPEL PRODUCTION OF AT&T RECORDS**

I, ROGER K. GANNAM, declare and state as follows:

1. I am over the age of 18 years. The statements in this declaration are true and correct, based upon my personal knowledge (unless otherwise indicated), and if called upon to testify to them, I would and could do so competently.
2. I submit this declaration in opposition to Plaintiff’s Motion to Compel Defendants Liberty Counsel, Inc. and Rena Lindevaldsen to Produce AT&T Records (Doc. 582, the “Jenkins Motion”).
3. I am an attorney and the Assistant Vice President of Legal Affairs for Liberty Counsel, and am currently counsel of record in this case for Defendants Rena Lindevaldsen and Liberty Counsel, Inc.
4. Attached hereto as Exhibit A is a true and correct copy of the result of the free reverse phone number lookup search (“reverse lookup”) I performed at the website ZLOOKUP.com on January 13, 2021, using the number provided in Plaintiff’s filings for the Montgomery, Alabama office of Plaintiff’s counsel from the SPLC, (334) 956-8200. The search result indicated the owner of the number is “SOUTHERNPOVERTY.” The website took approximately ten seconds to return the search result.

5. Attached hereto as Exhibit B is a true and correct copy of the first page of the result of the fee-based reverse lookup I performed at the website SPOKEO.com on January 12, 2021, using the number provided in Plaintiff's filings for the Montgomery, Alabama office of Plaintiff's counsel from the SPLC, (334) 956-8200. I paid \$0.95 for a single reverse lookup with a seven-day trial membership, after which I will be charged \$24.95 per month for membership. The search result indicated several potential "owners" associated with the number, along with several additional people associated with some of the "owners." The website took less than five seconds to return the search result. Names of persons not widely known to be affiliated with SPLC and other personal information have been redacted from the search results included in Exhibit B.

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

Executed on January 15, 2021.

/s/ Roger K. Gannam
Roger K. Gannam



Reverse Phone Number Lookup

Like 101K Share

You can now lookup the owner of any mobile or cell phone using ZLOOKUP for entirely free. Reverse phone number lookup has never been more easy. You can now identify an unknown caller using our cutting edge cell phone lookup technology. We search millions of records to find the real person or business associated with a phone number. ZLOOKUP is 100% free and entirely hassle free reverse cell phone lookup - and it actually works! Our data sharing partnership with Numlookup, the world's best [reverse phone number lookup](#) service means that we are able to validate every request to provide the most accurate result.

Reverse Phone Lookup provided by Numlookup

Lookup SMS STATUS CALL

+1 3349568200

SOUTHERNPOVERTY

(334) 956-8200 is a landline number serviced by
Level 3 Communications, LLC

New Lookup

EXHIBIT A



Recent Cell Phone Lookups

(901) 235-9182 MEMPHIS, TN

(323) 896-9215 HEATHER WILLIAM

(201) 425-6014 WEEHAWKEN, NJ

(419) 322-6930 HARMON,ROBERT

(585) 773-9476 MILAGROS DORREG

(707) 771-0811 CASSANDR WILCOX

(304) 820-7942 MARTINSBURG, WV

0921 047 9959 IRAN, ISLAMIC R

(469) 558-5335 DALLAS, TX

(551) 444-2070 JERSEY CITY, NJ

0431 147 800 AUSTRALIA

(903) 292-3111 DALLAS, TX

(203) 685-7826 BLOOMFIELD, CT

(727) 344-9556 TAMPA, FL

(613) 752-4481 CALABOGIE, ON

0650 7966730 AUSTRIA

(631) 987-2119 ELMSFORD, NY

07774 972922 UNITED KINGDOM



07484 631548 UNITED KINGDOM

07448 829050 UNITED KINGDOM

079049 20626 INTERNATIONAL

(614) 721-1345 COLUMBUS, OH

07398 887015 UNITED KINGDOM

(323) 742-7780 BURBANK, CA

064 527 8759 INTERNATIONAL

079049 05902 INTERNATIONAL

095784 03257 SEETHA.AMMA

(843) 594-0678 CHARLESTON, SC

How to find name using reverse phone number lookup.



1 Go to ZLOOKUP.COM

1- Go to www.zlookup.com

Open your web browser up and just go to www.zlookup.com



2- Enter phone number

2- Enter Phone Number

Enter the phone number on the dialpad.



3- Click on "Lookup"

Click on "Lookup" and you are all set!

Reverse Cell Phone Lookup From Computer

 free reverse phone lookup using internet

ZLOOKUP lets you find out the true owner of any phone number. Did you just get a missed call and are trying to find out who called you? Not a problem. With ZLOOKUP, all you need to do is enter the phone number and we will provide you with owner's full name instantly. We sift through millions of records to provide you the most accurate information. Our reverse phone lookup service is entirely free. Unlike most other web services that claim to offer free reverse phone lookup but never really work, we provide completely hassle free name lookup for any mobile or fixed phone number. You do not need to sign up or pay anything to lookup name for any phone number. Your trust is very important to us and we keep your information completely secure and anonymous. ZLOOKUP is the only free phone lookup resource that provides the latest ownership information. You no longer have to worry about the freshness of our data. While most other services cache phone records, we update our databases on an on-going basis to ensure that our phone lookup returns the most accurate information.

Free Phone Number Lookup



free of charge. We believe in information transparency and hopefully, you will find our service useful.

Name Lookup by Phone Number

Zlookup only needs an active phone number to perform name search. We not only search our own phone number databases, we also request mobile phone companies to return phone owner's name. If the phone number is not active, we might not be able to return any useful information. Also if the mobile phone is owned and paid for the person's employer, you will see the employer's name in the result. We believe that we provide the most up to date phone ownership information that can be had online. Please let your friends and family know about our service - we only ask that you share our service if you like it.

How else can I lookup phone numbers?

The only other free way to looking up owner's name for a phone number is by just searching for the phone number on google. If the phone number is listed on any website that has been indexed by google, you will be able to see the web page. This does not guarantee that you will be able to find out who the owner of the phone number is. If the phone number belongs to a business, you will be able to find the business name and location by google search. If the phone number belongs to an individual, the odds of finding any related content to the phone number is very low. Your best bet would be to use Zlookup to lookup phone numbers.

What is a free reverse phone number lookup?

Reverse phone number lookup means the ability to locate the owner information by using just a phone number. Zlookup is the only internet company, other than NumLookup that also offers free [Reverse Phone Lookup](#), that allows people across the world to freely and accurately lookup phone owners in under a minute. Most other services either do not report accurate information or are just not free.



know that we are not here to make money. Our goal is to minimize phone abuse and enable people to find out who called them. We were frustrated by getting random calls and never being able to find out who the caller was. We wanted to build a product that allow people to enter a phone number, any phone number, and be able to locate the phone's true owner. We set out to solve a problem and not to create another app that could be monetized. We believe Zlookup will create more transparency and accountability around mobile and fixed phones and will hold people accountable for their communication related actions. Please share us and spread the word about zlookup if you like us.

FAQs

How is ZLOOKUP different from other reverse lookup services?

How does ZLOOKUP make money if reverse cell phone lookup is completely free?

ZLOOKUP

[About/Contact](#)

[FAQ](#)

[Reverse Phone Number Lookup](#)

[Privacy Policy & Terms of Use](#)

[Related Sites](#)



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Results for 334-956-8200

Sourced from 3.9 billion records

PHONE INFORMATION



CALLER NAME

[REDACTED]



OWNER ADDRESS

[REDACTED]



OWNER LOCATION

Montgomery, AL



CARRIER

[REDACTED]



PHONE TYPE

Business Landline



AREA CODE LOCATION

Montgomery, AL



AGE

[REDACTED]

OWNER DETAILS

[REDACTED]

Owner

Lives at [REDACTED]

Related to [REDACTED]

Includes Profile Address Phone Email

Mark Potok

Owner

Lives at 400 Washington Ave, Montgomery, AL 36104

Includes Profile Address Phone Email

Rhonda Brownstein

Owner

Lives at 400 Washington Ave, Montgomery, AL 36104

Also known as [REDACTED]

Includes Profile Address Phone Email

[REDACTED]

Owner

Lives at 400 Washington Ave, Montgomery, AL 36104

Includes Profile Address Phone Email

Jack Richard Cohen [REDACTED]

Owner

Lives at 400 Washington Ave, Montgomery, AL 36104

Also known as J Richard Cohen, [REDACTED]

Related to [REDACTED]

Includes Profile Address Phone Email

Morris S Dees [REDACTED]

Owner

Lives at 400 Washington Ave, Montgomery, AL 36104

Also known as Dees Morris

Related to [REDACTED]

Includes Profile Address Phone Email

EXHIBIT B

