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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **WESTERN DIVISION**

18 SEAN HALL, *etc., et al.*, ) Case No. 2:17-cv-06882 MWF (ASx)  
19 Plaintiffs, )  
20 vs. ) DECLARATION OF TAYLOR SWIFT  
21 TAYLOR SWIFT, *etc., et al.*, ) IN SUPPORT OF DEFENDANTS'  
22 Defendants. ) SECOND MOTION FOR SUMMARY  
23 ) JUDGMENT  
24 ) Date: September 19, 2022  
Time: 10:00 a.m.

25 Courtroom of the Honorable  
26 Michael W. Fitzgerald  
United States District Judge  
27  
28

**DECLARATION OF TAYLOR SWIFT**

I, Taylor Swift, declare and state:

1. 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.

3. I was born on December 13, 1989, in West Reading, Pennsylvania. My family and I lived in Shillington, Pennsylvania, on a working Christmas Tree Farm in a farmhouse. When I was approximately ten years old, my family moved to a rental house nearby in Wyomissing Hills in Berks County, Pennsylvania, and I was enrolled 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 approximately twelve when I began to write songs and took guitar lessons, and 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 music career in nearby Nashville. I attended Hendersonville High School for a year and a half and then switched to home schooling to accommodate my touring and 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

1 went to were for country and folk rock singers, LeAnn Rimes, Billy Gilman and  
2 Melissa Etheridge. My parents limited what I could watch and listen to, and did not  
3 permit me to watch TRL until I was about 13 years old.

4 5. My first album, *Taylor Swift*, was recorded in Nashville in 2005 and  
5 released in 2006. It consists solely of country music and includes my first hit single,  
6 *Tim McGraw*. As my career developed, I began incorporating elements of other  
7 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.

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

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

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

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

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

17 11. In 2013, approximately a year before I wrote the lyrics to *Shake It Off*, I  
18 performed at the Billboard Music Awards wearing a bodysuit that incorporated a t-  
19 shirt emblazoned with the phrase “haters gonna hate.” A true and correct copy of that  
20 t-shirt is attached to this Declaration as Exhibit 117. The t-shirt was purchased from  
21 a store, Urban Outfitters. I wore that bodysuit for my performance at the Billboard  
22 Music Awards because I was struck by messages that people prone to doing something  
23 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*  
25 with Max Martin and Shellback in the studio. I included versions of the players play  
26 and haters hate phrases in *Shake It Off* because, as they express resistance to  
27 negativity, they further *Shake It Off*’s message of independence and “shaking off”  
28

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

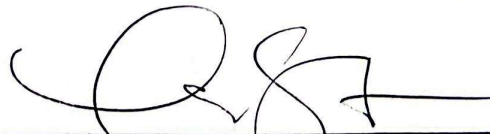
3 13. The phrases “Heartbreakers gonna break, break, break, break, break, /  
4 And the fakers gonna fake, fake, fake, fake, fake” were included because they also fit  
5 the beat of the song, they loosely rhymed with my versions of player and hater phrases  
6 discussed above, and because they represented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

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

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

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

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

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TAYLOR SWIFT