

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

ARIADNA JACOB and INFLUENCES, INC.

Plaintiffs,

Case No. 1:21-cv-06807

- against -

TAYLOR LORENZ and THE NEW YORK TIMES COMPANY,

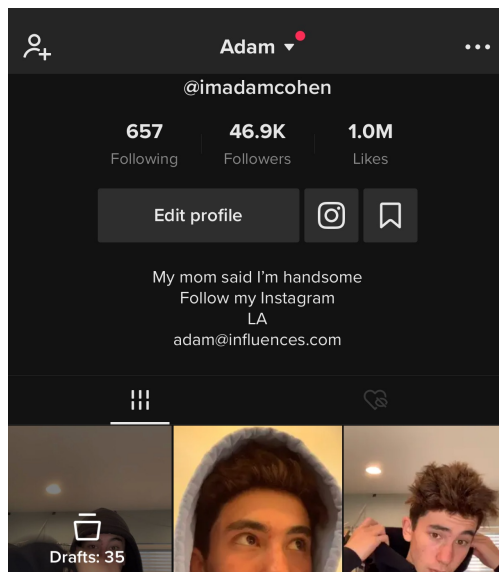
Defendants.

**DECLARATION OF ADAM COHEN IN SUPPORT OF PLAINTIFFS ARIADNA JACOB AND
INFLUENCES, INC.**

I, Adam Cohen, pursuant to any and all applicable law, hereby declare as follows:

1. I am currently eighteen years old and I am a student at University of California Los Angeles.
2. In or around December 2019 I sent a DM to the Influences Instagram account managed by Ariadna Jacob. It was well known that Influences was working with Charli D'Amelio who was one of the most influential people on TikTok at the time. I was also looking for a social media manager. Ms. Jacob had a very good reputation at the time.
3. On or around January 27, 2020 my father and I signed a management agreement with Influences. I was sixteen years old at the time.
4. From approximately January 2020 until August 2020, I was managed by Influences and Ms. Jacob. Ms. Jacob talked to my parents regularly. She also brought me many opportunities that helped my career.
5. During the course of working with Ms. Jacob I attended many collaborations at the three content houses Ms. Jacob managed including Girls in the Valley, Drip Crib and Kids Next Door. I witnessed that all the content houses that were managed by Influences had an iPad at the entrance with a system that required people to sign in and sign a waiver. The waiver stated that creators knew that everything filmed on the property belonged to Influences, that they could not disparage Ms. Jacob or Influences and that there were cameras throughout every property. It was well known across the TikTok creator industry that Influences required guests of the content houses to sign an NDA, non-disparagement and liability waiver. This was common practice at other collab houses that existed at the time.
6. In or around May 2020, while I was working with Ms. Jacob on a collab house of my own called *Alpha House* I followed Taylor Lorenz on Instagram because Ms. Jacob told me that Ms. Lorenz wrote an article about Charli D'Amelio published in the New York Times that made Charli and others very successful. The title of that January 2020 article was [Hype House and the Los Angeles TikTok Mansion Gold Rush](#). I wanted Ms. Lorenz to know who I was and to know about my *Alpha House* project. I started communicating with Ms. Lorenz through Instagram DM.
7. In or around May 2020 Ms. Lorenz contacted me about a story on collab houses. Ms. Lorenz asked if I could talk on the phone with her about a story but it was late at night so I asked if we could talk in the morning. When we spoke the next morning, Ms. Lorenz asked how old I was and asked me about my collab house project. The conversation was positive although I felt very intimidated, nervous and scared of Ms. Lorenz because of the

power dynamic. My parents never spoke to Ms. Lorenz and she did not ask to speak to them at the time. Ms. Lorenz also asked who my manager was and I told her it was Ms. Jacob and Influences. My Instagram profile had my email displayed as adam@influences.com so brands and journalists could contact my manager to get in touch with me.



8. Ms. Lorenz’s story in the *New York Times*, titled: “[Delayed Moves, Poolside Videos and Postmates Spon: The State of TikTok Collab Houses](https://www.nytimes.com/2020/05/21/style/tiktok-collab-houses-quarantine-coronavirus.html)”¹ included a quote about Alpha House which I was very proud of at the time. It was a big accomplishment for any content creator to be mentioned in the *New York Times*. Immediately after the article was published, I received an increase in emails from brands who wanted to work with me and other creators who wanted to be part of my house.

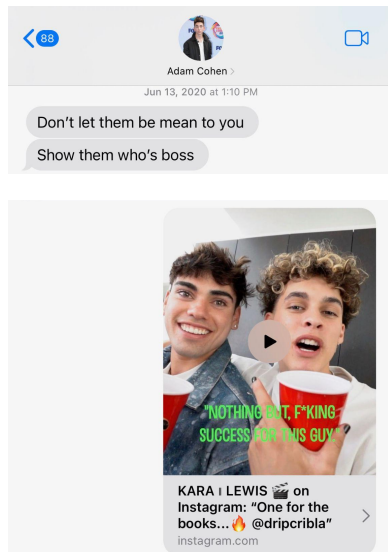
9. In or around June 2020, many of the Girls in the Valley and Drip Crib members began posting photos and videos²³ of themselves at parties. I was aware of the parties and understood that Ms. Jacob was stressed because photos and videos showed the creators were behaving badly and not following the rules. Ms. Jacob and I exchanged texts discussing the parties at the Drip Crib that the Girls in the Valley were attending. I texted Ms. Jacob, “Don’t let them be mean to you.” in reference to the creators who were breaking the rules and disrespecting Ms. Jacob. I believe Ms. Lorenz knew about most or all of the content house parties that occurred and which creators were in attendance because there were many outlets covering the subject at the time.⁴

¹ “[Delayed Moves, Poolside Videos and Postmates Spon: The State of TikTok Collab Houses](https://www.nytimes.com/2020/05/21/style/tiktok-collab-houses-quarantine-coronavirus.html)”
<https://www.nytimes.com/2020/05/21/style/tiktok-collab-houses-quarantine-coronavirus.html>

² Girls in the Valley, Dayna Marie & Emmy Combs party at Drip Crib Together - Posted June 17, 2020
<https://www.instagram.com/p/CBjq8mWhNK4/?igshid=NzNkNDdiOGI=>

³ Jesse Underhill and Cameron Buchanan party at Drip Crib - Posted June 27, 2020
<https://www.instagram.com/p/CB9Ngg6hLII/?igshid=NzNkNDdiOGI=>

⁴ Article & video about Drip Crib
<https://ktla.com/news/local-news/were-constantly-prisoners-in-the-house-neighbors-in-encino-community-urge-officials-to-take-action-against-party-house/>



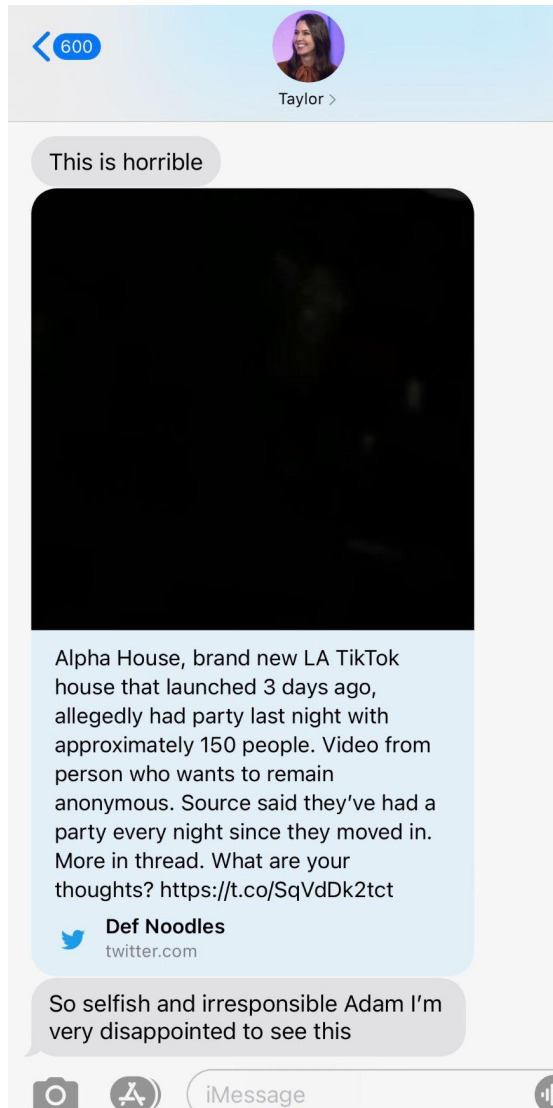
10. In or around August 2020, Ms. Lorenz called me again. This time her tone was very different from the first time we spoke. I recall her asking me if I was still working with Ms. Jacob, to which I responded yes. She followed by asking if I had heard all the stuff going on with Ms. Jacob, about her manipulating talent, behaving badly and other things that sounded very negative about Ms. Jacob and Influences. She told me that she had spoken to Alex Youmazzo, Emmy Combs from Girls in the Valley and other influential creators who had been managed by Influences at different points in time.

11. Although I felt pressured to give Ms. Lorenz negative information about Ms. Jacob, I had not experienced those negative interactions at any point during the seven months I had been working closely with Ms. Jacob. I did not witness Ms. Jacob behaving unprofessionally around any creators.

12. My response to Ms. Lorenz was that I knew Ms. Jacob for who she was and I didn't experience what she was describing. Ms. Lorenz continued to share more negative information for a few minutes but I did not go along with what she was saying. This seemed to anger Ms. Lorenz and she seemed pissed. She became very short with me after I did not share negative information about my manager and we ended the conversation.

13. On or around August 12, 2020, not too long after my conversation with Ms. Lorenz about Ms. Jacob, Ms. Lorenz texted me, "So selfish and irresponsible Adam I'm very disappointed to see this" in reference to a tweet about the Alpha House. The text made me feel upset. Ms. Lorenz knew I was just sixteen years old and this was my first business endeavor. It felt as though Ms. Lorenz was shaming me because of a business failure during an event I had hired security and an experienced event producer for. Content house projects are not easy. I was learning and

doing my best.



14. I believe that Ms. Lorenz acted in bad faith by spreading misinformation about Ms. Jacob and Influences unfairly. Based on what I witnessed of Ms. Jacob and Influences from December 2019 to the article in *The New York Times* on August 14, 2020 titled: [Trying to Make It Big Online. Getting Signed Isn't Everything](#), I believe Ms. Lorenz was one of the people who could have originated the negative information that was being spread about Ms. Jacob and not the TikTok creators. Before Ms. Lorenz's published the August 2020 article I had never seen or heard of any negative press about Ms. Jacob or Influences online or on social media.

15. In or around August 2020, after the August 14 article about Ms. Jacob, Influences attempted to continue overseeing the Alpha House project as my manager. Ms. Jacob had given me an iPad for guest sign-ins. At this point the creators were upset when they saw the Influences logo on the iPad and did not want Ms. Jacob or Influences to be involved with Alpha House. At this time, it was very unpopular to say anything positive about Ms. Jacob or Influences and those who didn't speak negatively about Jacob were bullied by other creators. Unlike what I witnessed at the December 2019 Instaskate event where Ms. Jacob was popular and respected amongst creators, after the August 14, 2020 New York Times article, I witnessed creators who had never met Ms. Jacob or anyone from Influences express very negative feelings about Ms. Jacob and Influences.

16. Following Ms. Lorenz's negative article about Ms. Jacob I did not feel like I could speak up about what happened due to Ms. Lorenz's influence and power. I also feared being retaliated against and bullied by other content creators who spoke to Ms. Lorenz.

Dated: Palm Springs, California

Sept. 30, 2020

/s/ Adam Cohen

ADAM COHEN