

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TALK RADIO NETWORK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 03C 3167
	)	
THOMAS V. LEAVITT <i>et al.</i> ,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF GUNILLA LEAVITT**

1. My name is Gunilla Leavitt. I make this affidavit in support of my motion to dismiss or change venue.

2. I am a resident of Santa Cruz, California. I grew up in Gothenburg, Sweden. I have never lived in or visited Illinois, apart from changing planes at Chicago O’Hare, and stopping at the bus station while on a transcontinental trip in 1984.

3. I am a professional web designer, and although I have worked for a variety of clients, none of them are based in Illinois; none of them compete with Michael Savage or Talk Radio Network. I do not own any property in Illinois, and I do not have any investments in Illinois companies.

4. This lawsuit has been filed over a web site that I designed for my husband to express opinions about the bigoted and offensive commentary of Michael Weiner, who has become known as Michael Savage. Weiner is a resident of northern California.

5. The web site is fully populated and updated by my husband. Since I finished designing it, I have had nothing to do with the content whatsoever. My job is to make things look pretty, and all I have done on the site is design. All of my work in that regard was done in California.

6. Like my husband Thomas, I had no awareness of any advertising by Culligan on the Savage radio program, no awareness that Savage was carried on Chicago radio stations, and no awareness that TRN had any advertising contracts with Culligan or any other Illinois companies. I did not consider the web site to be about TRN at all; it is about Savage.

Pursuant to 28 U.S.C. § 1746, I hereby certify under penalty of perjury that the foregoing is true and correct. Executed on June 6, 2003.

Gunilla Leavitt