

DECLARATION OF ROBIN R. COCKEY

Robin R. Cockey states as follows:

1. I am an attorney admitted to practice in this Court and the courts of the State of Maryland. I am a Senior Partner at the Law Offices of Cockey, Brennan & Maloney, P.C. I am counsel for Plaintiff, People for the Ethical Treatment of Animals, Inc. (“PETA”) in this action.

2. I submit this declaration in support of PETA’s Motion for a Preliminary Injunction.

3. I am above the age of eighteen and of sound mind. If called upon to testify to the content of this declaration, I could do so competently.

4. On March 24, 2021, I submitted a public records request to both the Tri-County Council for the lower Eastern Shore of Maryland and Shore Transit under the Maryland Public Information Act on behalf of PETA. Attached as Exhibit A is a true and correct copy of this request.

5. On May 4, 2021, Peter J. Golba of Seidel, Baker & Tilghman, P.A., the law firm that represents Tri-County Council, responded to my request with the results of the MPIA Request. Attached as Exhibit B is a true and correct copy of this correspondence.

6. Tri-County Council’s response to the request contained four categories of records.

7. The first category of records included the two electronic advertisements that were submitted by PETA, an email from Brianna Vazquez, a Senior Communications Administrator for PETA, and an email from Shore Transit concerning the advertisement issue. Attached as Exhibit C is a true and correct copy of these records.

8. The second category of records included the signed contract between Shore Transit and Vector Media, the advertising agency with which the public transit system contracts

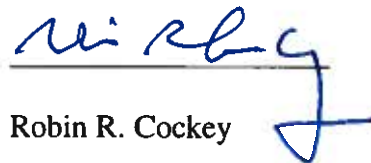
to place advertisements, as well as the Maryland Locally Operating Transit System (“LOTS”) manual. Attached as Exhibit D is a true and correct copy of these records.

9. The third category of records included Tri-County Council Executive Board meeting agenda and minutes (from March 14, 2018; March 21, 2018; May 16, 2018; July 29, 2015; and September 23, 2015), and an email correspondence concerning the rejection of a cannabis advertisement. Attached as Exhibit E is a true and correct copy of these records.

10. The fourth category of records included two spreadsheets showing Shore Transit’s 2020 and 2021 year-to-date advertisement revenue generation. Attached as Exhibit F is a true and correct copy of these records.

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

Executed on August 16, 2021.


Robin R. Cockey