

Derek S. Khanna (Cal. Bar No. 308563)
706 Tesoro Road
Monterey, CA 93940
Tel: (202) 643-248
Email: Derek.Khanna@gmail.com

Mark I. Bailen (D.C. Bar No. 459623), *Pro Hac Vice Forthcoming*
Bailen Law
1250 Connecticut Ave NW, Suite 700
Washington, DC 20036
Tel: (202) 656-0422
Email: mb@bailenlaw.com

April Mackenna White (N.Y. Bar No. 4799953), *Pro Hac Vice Forthcoming*
Bailen Law
100 Wall Street, Suite 1702
New York, NY 10005
Tel: (646) 397-3496
Email: mwhite@bailenlaw.com

Attorneys for the Plaintiff, Kurraba Group Exposed

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Kurraba Group Exposed, an
unincorporated association,

Plaintiff,

v.

Kurraba Group Pty Ltd, a New South
Wales, Australia, private limited company

Nicholas "Nick" Mark Smith, an
individual residing in New South Wales,
Australia,

Defendants.

Case No. _____

DECLARATION OF MICHAEL WILLIAMS

Declaration of Michael Williams

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1 I, Michael Williams, declare:

2 1. I am a community activist who resides primarily in Boston, Massachusetts, and
3 also in Sydney, New South Wales, Australia, on a part-time basis. I am over 18 years of age
4 and competent to testify. I submit this declaration in support of Plaintiff Kurraba Group
5 Exposed ("KGE") in the above-captioned action.

6 2. I have personal knowledge of the facts stated below, except where I indicate I
7 am relying on information provided to me by others, in which case I believe those facts to be
8 true.

9 3. I am not and have never been the publisher, creator, owner, operator, controller,
10 or poster of any content on KurrabaGroup.Exposed or its related social media accounts
11 (including the X/Twitter account @kurrabagroup). I have never written, uploaded, directed, or
12 approved any content for the KGE website or accounts. I have never had administrative access
13 to the KGE website, social media accounts, hosting services, or domain registration.

14 4. As a concerned community member, I submitted my personal experiences
15 regarding Kurraba Group and provided supporting documents to an email address and Signal¹
16 account associated with KGE. I had no control over what KGE did with those materials after
17 submission.

18 5. In late September 2025, I was copied on an email exchange between KGE's site
19 operators and attorneys for Kurraba Group and Nicholas Smith. In that exchange, the site
20 operators stated that I was not involved in running or operating KGE.

21 6. Prior to being sued, and in response to receiving an email thread from Kurraba
22 Group Exposed replying to the Defendants, I communicated directly with representatives of

¹ Signal is an end-to-end encrypted messaging application that allows users to send messages, make voice and video calls, and share media securely.

Declaration of Michael Williams

1 Kurraba Group and/or their Australian counsel via email on September 30, 2025, absolutely
2 denying my involvement and suggesting that if they believed I was involved with the website,
3 they should first seek preliminary discovery in New South Wales or use appropriate U.S.
4 discovery mechanisms to identify the actual website operator. They did not pursue preliminary
5 discovery before filing suit against me.

6 7. On or about October 2, 2025, Kurraba Group Pty Ltd and Nicholas Smith filed
7 a defamation lawsuit against me in the District Court of New South Wales.

8 **SEO Qualifications and Observations**

9 8. I have fifteen (15) years of training and practical experience in search engine
10 optimization (SEO). My experience includes monitoring search engine results pages (SERPs),
11 analyzing indexing and de-indexing behavior, and distinguishing between normal algorithmic
12 ranking fluctuations and manual suppression or de-prioritization by search engines.

13 9. Between approximately the 20th and 26th of October 2025, I conducted searches
14 for the KGE website using Google search from both Australian and U.S. IP addresses/locations.
15 I searched for the following terms: "Kurraba," "Kurraba Group," "Kurraba Group Nick Smith,"
16 and "KurrabaGroup.Exposed."

17 10. Prior to October 2025, these searches consistently returned
18 KurrabaGroup.Exposed as the first or second result. Beginning around October 20, 2025, the
19 website ceased appearing in search results for these terms in both Australia and the United
20 States, despite the site remaining accessible via direct URL.

21 11. I personally verified that the website was still online and accessible by entering
22 the URL directly into my browser at least daily from October 20, 2025, to the date of signature
23 on this declaration.

24 12. Based on my professional experience in SEO, the complete disappearance of a
25 website from search results for its own exact domain name and branded terms is not consistent

Declaration of Michael Williams

1 with regular algorithmic ranking changes. In my experience, such abrupt and total removal
2 across multiple geographic regions typically indicates either technical de-indexing, manual
3 suppression by the search engine, or application of a search visibility restriction.

4 13. I reviewed publicly available traffic analytics from KGE operators, which
5 showed that the website's traffic declined by more than 90% during the same period in October
6 2025, and by over 95% for users in the United States. Based on my review of the provided
7 reports, several hundred individuals per day visited KGE, including at least 50 per day in the
8 United States.

9 14. Based on the timing, scope, and nature of the ranking loss I observed, it is my
10 professional opinion that KurrabaGroup.Exposed was either de-indexed or subject to
11 significant algorithmic or manual de-ranking by Google, rather than experiencing normal
12 search ranking fluctuations.

13 **Activism Context**

14 15. I have been a public critic of Kurraba Group's proposed development at 100
15 Botany Road in Sydney. I have participated in lawful community opposition to this
16 development, including filing formal objections with the relevant local council or authority and
17 speaking at public meetings held on February 13, 2025.

18 I declare under penalty of perjury under the laws of the United States of America, pursuant to
19 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on: October 28, 2025

Signed under penalty of perjury,

/s/Michael Williams

Michael Williams

Declaration of Michael Williams

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