

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, INC., et al.,

Plaintiffs,

v.

HATHITRUST, et al.,

Defendants.

Case No. 11-cv-6351(HB)

DECLARATION OF COURTNEY WHEELER

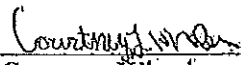
I, Courtney Wheeler, do hereby declare that:

1. I am over eighteen years of age and am competent to make this Declaration.
2. My home address is 3919 Sterling Drive, Eau Claire, Wisconsin, 54701.
3. I am legally blind.
4. I currently am a junior at the University of Wisconsin, Eau Claire. I intend to transfer to the University of Wisconsin, Stout, for the spring 2012 semester. I am pursuing a bachelor's degree in Psychology.
5. I prefer to access print materials using the screen reader on my computer.
6. When I purchase textbooks for my classes, I am usually able to obtain an accessible copy of those books from Learning Ally, a service that provides audio recorded versions of purchased texts for blind readers. Learning Ally, however, is not available for books I wish to borrow from the University of Wisconsin Library.
7. To get access to print library books, I bring my husband or a friend as a reader. This process is very time consuming and dependent on the availability of a reader.

8. As a result, I choose not to take elective classes that require research papers. In the past, I have unsuccessfully petitioned the University of Wisconsin to exempt me from conducting library research as an accommodation for my disability, and from courses that require specific books and reading materials that are not available in accessible formats. However, I would prefer the opportunity to have access to library materials to the same extent and at the same time as everyone else, because I would like to take advantage of all of the educational opportunities available to my peers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 12/6/11



Courtney Wheeler