

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

MILLERCOORS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 19-cv-218-WMC
)	
ANHEUSER-BUSCH COMPANIES, LLC,)	
)	
Defendant.)	

DECLARATION OF CESAR VARGAS IN SUPPORT OF ANHEUSER-BUSCH COMPANIES, LLC’S OPPOSITION TO MILLERCOORS, LLC’S MOTION FOR A PRELIMINARY INJUNCTION

1. My name is Cesar Vargas. I am currently the Vice President of Legal and Corporate Affairs for Anheuser-Busch Companies, LLC.
2. Exhibit 1 to this Declaration are texts sent to me by Peter Marino, Chief Public Affairs and Communications Officer for MillerCoors, LLC on Monday, February 4, 2019, the day after Super Bowl LIII.
3. A screen shot of these texts is below. Mr. Marino’s texts are in gray and my texts are in green:



4. Mr. Marino responded to my text as follows (again Mr. Marino's text is in gray):

Mon, Feb 4, 9:50 AM

Of course it's not personal. But I do really want to thank you because you don't realize what a massive gift you handed us. Thank you. Next beers are on me! You can pick them too. You want the rice beer or the corn beer, it doesn't matter to me. A sincere thanks to you and the team. This is awesome!

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Executed this 11th day of April, 2019



Cesar Vargas

EXHIBIT 1

Mon, Feb 4, 6:25 AM

You gave us a gift. Thank you.

You are welcome but who is this?

The guy you picked a fight with. It's Pete Marino

Oh sorry Pete I did not have your cell in my phone. I hope you don't see it in that personal way. Just two companies competing.



Text Message



Verizon

2:53 PM

45%

New Message

Cancel

To: Pete Marino

Just two companies competing.

Mon, Feb 4, 9:50 AM

Of course it's not personal. But I do really want to thank you because you don't realize what a massive gift you handed us. Thank you. Next beers are on me! You can pick them too. You want the rice beer or the corn beer, it doesn't matter to me. A sincere thanks to you and the team. This is awesome!



Text Message

