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12 Attorneys for Plaintiff
 13 COURTHOUSE NEWS SERVICE

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA
 16 WESTERN DIVISION

17 Courthouse News Service,

18 Plaintiff,

19 v.

20 Michael D. Planet, in his official capacity
 21 as Court Executive Officer/Clerk of the
 22 Ventura County Superior Court.

23 Defendant.

CASE NO. CV11-08083 R (MANx)

**[PROPOSED] ORDER RE
 COURTHOUSE NEWS'
 EVIDENTIARY OBJECTIONS TO
 THE DECLARATIONS OF JULIE
 CAMACHO, CHERYL KANATZAR,
 ROBERT SHERMAN AND KAREN
 DALTON-KOCH**

Date: Nov. 21, 2011
 Time: 10:00 am
 Courtroom: G-8 (2nd Floor)
 Judge: The Hon. Manuel L. Real

I. OBJECTIONS TO THE DECLARATION OF JULIE CAMACHO

| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <p><u>Declaration of Julie Camacho in Support of Defendant’s Opposition to Plaintiff’s Motion for Preliminary Injunction (“Camacho Decl.”), ¶ 4:</u></p> | <p>Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Improper Opinion Testimony (FRE 701); Unsubstantiated Summary (FRE 1006).</p> | <p><u>Sustained:</u> <input type="checkbox"/></p> <p><u>Overruled:</u> <input type="checkbox"/></p> |
| <p><u>Camacho Decl., ¶ 7:</u></p> | <p>Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403).</p> | <p><u>Sustained:</u> <input type="checkbox"/></p> <p><u>Overruled:</u> <input type="checkbox"/></p> |

| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., Exhibit B:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 8:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 10:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 11:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 12:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., Exh. C:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 13:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., Ex. D:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 14:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 15:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 16:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 17:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 18:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 19:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 20:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 21:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Camacho Decl., ¶ 22:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Unsubstantiated Summary (FRE 1006). | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

| <u>MATERIAL OBJECTED TO</u> | <u>OBJECTION AND GROUNDS</u> | <u>RULING</u> |
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| <u>Camacho Decl., ¶ 23:</u> | Hearsay (FRE 802); Not Subject to Any Exception (FRE 803); Lacks Foundation (FRE 104(b)); Lacks Personal Knowledge (FRE 602); Irrelevant (FRE 402); Insufficiently Probative (FRE 403); Improper Opinion Testimony (FRE 701); Unsubstantiated Summary (FRE 1006). | <p><u>Sustained:</u> <input type="checkbox"/></p> <p><u>Overruled:</u> <input type="checkbox"/></p> |

II. OBJECTIONS TO THE DECLARATION OF CHERYL KANATZAR

| <u>MATERIAL OBJECTED TO</u> | <u>GROUNDS FOR OBJECTION</u> | <u>RULING</u> |
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| <u>Kanatzar Decl., ¶ 5:</u> | Irrelevant (FRE 402) | <p><u>Sustained:</u> <input type="checkbox"/></p> <p><u>Overruled:</u> <input type="checkbox"/></p> |

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| <u>Kanatzar Decl. ¶ 6:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 7:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 8:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 9:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>Kanatzar Decl., ¶ 10:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 11:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 29:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 32:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>Kanatzar Decl., Exh. A:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., Exh. B:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 12:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., Exh. C:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>Kanatzar Decl., ¶ 13:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 14:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 15:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 16:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>Kanatzar Decl., ¶ 17:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 18:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 30:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Kanatzar Decl., ¶ 31:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| 1 2 3 4 5 6 | <u>Kanatzar Decl., ¶ 32:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| 7 8 9 10 11 12 | <u>Kanatzar Decl., ¶ 33:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| 13 14 15 16 17 18 | <u>Kanatzar Decl., ¶ 34:</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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20 **III. OBJECTIONS TO THE DECLARATION OF ROBERT SHERMAN**

| 21 22 | <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
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| 23 24 25 26 27 28 | <u>Declaration of Robert Sherman in Support of Defendant’s Opposition to Plaintiff’s Motion for Preliminary Injunction (“Sherman Decl.”), ¶ 2</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
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| <u>Sherman Decl., ¶ 3</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 4</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 5</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 6</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
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| <u>Sherman Decl., ¶ 7</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 8</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 9</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 10</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
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| <u>Sherman Decl., ¶ 11</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 12</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 13</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., ¶ 14</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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| <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
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| <u>Sherman Decl., ¶ 15</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., Exh. A</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |
| <u>Sherman Decl., Exh. B</u> | Irrelevant (FRE 402) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

1 **IV. OBJECTIONS TO THE DECLARATION OF KAREN DALTON-KOCH**

| <u>MATERIAL OBJECTED TO</u> | <u>GROUND FOR OBJECTION</u> | <u>RULING</u> |
|---|--|--|
| <u>Declaration of Karen Dalton-Koch in Support of Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction, Exhibit A:</u> | Irrelevant (FRE 402); Lacks Foundation (FRE 104(b)) | <u>Sustained:</u> <input type="checkbox"/> <u>Overruled:</u> <input type="checkbox"/> |

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11 IT IS SO ORDERED

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13 Date: _____, 2011

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16 The Honorable Manuel L. Real
17 United States District Court Judge
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