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11 SEP 29 AM 11:55
 DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 LOS ANGELES

FILED

12 Attorneys for Plaintiff
 13 COURTHOUSE NEWS SERVICE

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA

16 **CV11-08083 P(MANR)**
 17 CASE NO.

18 Courthouse News Service,

19 Plaintiff,

20 v.

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

24 Defendant.

25 **DECLARATION OF KAREN COVEL**
 26 **IN SUPPORT OF MOTION OF**
 27 **COURTHOUSE NEWS SERVICE**
 28 **FOR PRELIMINARY INJUNCTION**

Date: Nov. 7, 2011
 Time: 10:00 am
 Courtroom: _____
 Judge: _____

I, Karen Covell, declare and state as follows:

1. I am a certified public accountant and a shareholder in the accounting firm of Lauer, Georgatos & Covell in San Diego. I have personal knowledge of the following facts and could testify to them if called as a witness.

1 2. I have worked as the accountant for Courthouse News Service for the
2 past eight years. Over the years, I have consulted with Courthouse News on a range
3 of matters related to its business operations. From time to time, I have also been
4 asked by Courthouse News' Editor Bill Girdner to assist in preparing statistics related
5 to access at various courts that are covered by Courthouse News' reporters.

6 3. I was provided with raw data related to newly filed unlimited jurisdiction
7 civil complaints that were accessed at the Ventura County Superior Court between
8 August 8 and September 2, 2011, as compiled by Julianna Krolak, Courthouse News'
9 Ventura County Superior Court reporter. Ms. Krolak provided me with the case
10 number for each complaint she reviewed, the date each complaint was filed, and the
11 date that she was able to access the complaint. She also indicated which of the 152
12 complaints that she reviewed during that period were reported in the Central Coast
13 Report, which I understand Ms. Krolak is responsible for compiling.

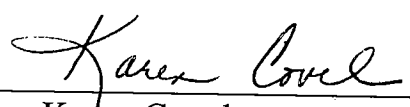
14 4. Attached hereto as Exhibits 1-4 are true and correct copies of four
15 spreadsheets illustrating those statistics for the August 8-September 2, 2011, time
16 period.

- 17 • The first spreadsheet, attached as Exhibit 1, illustrates in calendar
18 days the delays in access to all new unlimited jurisdiction civil
19 complaints that were reviewed by Courthouse News' reporter.
- 20 • The second spreadsheet, attached as Exhibit 2, illustrates in court
21 days the delays in access to all new unlimited jurisdiction civil
22 complaints that were reviewed by Courthouse News' reporter.
- 23 • The third spreadsheet, attached as Exhibit 3, illustrates in
24 calendar days the delays in access to all new unlimited
25 jurisdiction civil complaints that were reported on by Courthouse
26 News.

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- The fourth spreadsheet, attached as Exhibit 4, illustrates in court days the delays in access to all new unlimited jurisdiction civil complaints that were reported on by Courthouse News.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Diego, California on this 28th day of September 2011.



Karen Covell

EXHIBIT 1

Full Text Availability for Complaints REVIEWED by Courthouse News Service - Ventura County Superior Court (calendar days)

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%
TOTAL CASES REPORTED ON	15	5	11	14	5	6		2	15	5	5	5	10	12	3	2	1	12	11	13	152	100.00%

FULL TEXT AVAILABLE:

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%	
SAME DAY			1			1			1					1	1				3	1	9	5.921%	
NEXT DAY			1	1	3				2					4					1	5	21	13.816%	
2 DAYS			4	3	1					1									6	4	2	23	15.132%
3 DAYS	3			3		2			4	4	1					1					5	26	17.105%
4 DAYS	4					2					1	1										8	5.263%
5 DAYS	2	2	2								1	2										11	7.237%
6 DAYS	2	2	1	4		1			5		2	1	2	3		1		2			26	17.105%	
7-14 DAYS	2	1	2	3	1				3			1	4		1		1	1	3		23	15.132%	
15-34 DAYS	2							2										1			5	3.289%	
TOTALS	15	5	11	14	5	6		2	15	5	5	5	10	12	3	2	1	12	11	13	152	100.000%	

EXHIBIT 2

Full Text Availability for Complaints REVIEWED by Courthouse News Service - Ventura County Superior Court (court days)

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%
TOTAL CASES REPORTED ON	15	5	11	14	5	6	2	15	5	5	5	5	10	12	3	2	1	12	11	13	152	100.00%

FULL TEXT AVAILABLE:

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%
SAME DAY	3	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	9	5.921%
NEXT DAY	4	4	4	3	1	2	2	2	4	1	1	1	1	1	1	1	1	1	1	5	28	18.421%
2 DAYS	2	2	2	3	4	4	4	4	1	1	1	1	1	1	1	1	1	1	1	2	31	20.395%
3 DAYS	2	2	1	4	1	1	1	2	2	2	2	1	2	3	3	1	2	2	3	5	30	19.737%
4 DAYS	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	3	26	17.105%
5 DAYS	2	1	1	3	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	4	9	5.921%
6 DAYS	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	12	7.895%	
7-14 DAYS	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	3	12	7.895%
15-24 DAYS	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	3	1.974%
TOTALS	15	5	11	14	5	6	2	15	5	5	5	5	10	12	3	2	1	12	11	13	152	100.00%

EXHIBIT 3

Full Text Availability for Complaints REPORTED ON by Courthouse News Service - Ventura County Superior Court (calendar days)

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%
TOTAL CASES REPORTED ON	10	3	8	12	4	3	0	2	8	2	2	4	4	6	2	1	1	10	10	8	100	100%

FULL TEXT AVAILABLE:

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%	
SAME DAY																							
NEXT DAY			1	1	2				2			2		3					3	1	4	4	4%
2 DAYS			4	3	1									1	1				1	2	14	14%	
3 DAYS	1			3		1			2	2	1			1		1			3	1	20	20%	
4 DAYS	3					1					1			1						4	16	16%	
5 DAYS	2	2	2										1								5	5%	
6 DAYS	1	1		3		1			1			1	1	1							7	7%	
7-14 DAYS	1		1	2	1				3			1	2		1		1	1	3		17	17%	
15-34 DAYS	2							2										1			5	5%	
TOTALS	10	3	8	12	4	3	0	2	8	2	2	4	4	6	2	1	1	10	10	8	100	100%	

EXHIBIT 4

Full Text Availability for Complaints REPORTED ON by Courthouse News Service - Ventura County Superior Court (court days)

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%
TOTAL CASES REPORTED ON	10	3	8	12	4	3	0	2	8	2	2	4	4	6	2	1	1	10	10	8	100	100%

FULL TEXT AVAILABLE:

	Mon 8/8/11	Tue 8/9/11	Wed 8/10/11	Thu 8/11/11	Fri 8/12/11	Mon 8/15/11	Tue 8/16/11	Wed 8/17/11	Thu 8/18/11	Fri 8/19/11	Mon 8/22/11	Tue 8/23/11	Wed 8/24/11	Thu 8/25/11	Fri 8/26/11	Mon 8/29/11	Tue 8/30/11	Wed 8/31/11	Thu 9/1/11	Fri 9/2/11	TOTAL	%	
SAME DAY																							
NEXT DAY	1		1	1	2	1			2		1	2		3		1			1	3	1	4	4%
2 DAYS	3		4	3	1	1					1			1	1					2	2	18	18%
3 DAYS	2	2	2	3					2	2			1	1				6	3	1	1	25	25%
4 DAYS	1	1		3		1			1			1	1	1				2			4	19	19%
5 DAYS									1			1	1						3			7	7%
6 DAYS			1						1						1							3	3%
7-14 DAYS	2			2				1	1				1				1	1				9	9%
15-24 DAYS	1							1										1				3	3%
TOTALS	10	3	8	12	4	3	0	2	8	2	2	4	4	6	2	1	1	10	10	8	100	100%	