

1 I, Jerry H. Stein, declare as follows:

2 1. I am an attorney at law duly licensed to practice before all courts of the State of California
3 and before this Court. I am a partner in the law firm of Levin & Stein, which firm represents the Does in
4 this action. I have personal knowledge of all facts set forth in this Declaration and if called upon to
5 testify, I could and would testify competently thereto.

6 2. On April 14, 2008, I did a search on the Lexis data base to determine if there were any
7 transactions in which the Estate of Bernice Pauahi Bishop (the "Estate") appeared as a seller or buyer of
8 real property in California. Four such transactions were identified, including a June 2003 transaction in
9 which the Estate sold property in Riverside County. A true and correct printout of the information
10 available on Lexis regarding this June of 2003 transaction is attached hereto as Exhibit 1.

11 3. Attached hereto as Exhibit 2 is a true and correct copy (without attachments) of an E-mail
12 I received from Paul Alston, one of the Estate's attorneys. The E-mail provides in relevant part:

13 "Attached is a letter the Cades firm received from Banks & Watson. As you will see, that
14 letter claims (wrongly) that KS "believes it has no claim" against Mr. Grant. KS presently
15 has no such belief; it is, as I said above, still evaluating its rights."

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 15,
17 2008.

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19 /s/ Jerry H. Stein¹
20 Jerry H. Stein

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28 ¹ Counsel has the executed original.