

**John Doe #51**

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 16 \*\* *Designated Counsel for Service*

**United States District Court  
 Eastern District of California  
 Sacramento Division**

<p>19 <b>ProtectMarriage.com, et al.,</b>          20          21 <i>Plaintiffs,</i>          22 v.          23 <b>Debra Bowen, et al.,</b>          24 <i>Defendants.</i></p>	<p>Case No. 2:09-CV-00058-MCE-DAD          DECLARATION OF <b>REDACTED</b> IN          SUPPORT OF PLAINTIFFS' MOTION          FOR SUMMARY JUDGMENT          Date: TBD          Time: TBD.          Judge England</p>
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 28 Declaration of **REDACTED** in  
 Support of Plaintiffs' Motion for  
 Summary Judgment

1 I, **REDACTED**, make the following declaration pursuant to 28 U.S.C. § 1746:

2 1. I am a resident of the state of California over 18 years of age, and my statements herein  
3 are based on personal knowledge.

4 2. I supported the passage of Proposition 8.

5 3. In support of Proposition 8, I donated **\$X,XXX** to the National Organization for Marriage  
6 California - Yes on 8, Sponsored by National Organization for Marriage.

7 4. Because of my support for Proposition 8, I received many emails from people who  
8 were angry about my support of Proposition 8. Mostly, the emails referred to me as a “bigot” or  
9 a “gay hater,” and/or they mocked Christianity. I have since deleted these emails.

10 5. Because of my support for Proposition 8, many websites began slandering me as a  
11 “bigot,” “gay hater,” or “racist.” At some point in December, there were over 30 websites  
12 slandering me in this way.

13 6. Because I do a large amount of public speaking, when people searching for me on the  
14 internet search for my name, these websites come up.

15 7. My son is an actor. Because of the harassment he received for his support of  
16 Proposition 8, he has had to change the name under which he acts.

17 8. If I was asked to support a cause similar to Proposition 8 in the future, these incidents  
18 would definitely affect my support. As a father who saw how support of Proposition 8 affected  
19 my son, I would hesitate to donate to a similar cause if there was not a way to keep our giving  
20 confidential.

21 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE  
22 AND CORRECT.

23 Executed on: **REDACTED** **REDACTED**  
24 **REDACTED**  
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27  
28 Declaration of **REDACTED** in  
Support of Plaintiffs’ Motion for  
Summary Judgment

1 **CERTIFICATE OF SERVICE**

2 I, Scott F. Bieniek, am over the age of 18 years and not a party to the within action. My  
3 business address is 1 South Sixth Street, Terre Haute, Indiana 47807.

4 On June 3, 2009, I electronically filed the foregoing document described as Declaration of  
5 John Doe #51 in Support of Plaintiffs' Motion for Summary Judgment, with the Clerk of Court  
6 using the CM/ECF system which will send notification of such filing to:

7 Zackery P. Morazzini  
8 zackery.morazzini@doj.ca.gov  
*Attorney for Defendants Debra Bowen and Edmund G. Brown, Jr.*

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15 Department of Elections - City and Count of San Francisco*

16 Lawrence T. Woodlock  
17 lwoodlock@fppc.ca.gov  
*Attorney for Defendant Members of the Fair Political  
Practices Commission*

18 I declare under the penalty of perjury under the laws of the State of Indiana that the above is  
19 true and correct. Executed this 3rd day of June, 2009.

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21  
22 /s/ Scott F. Bieniek  
23 Scott F. Bieniek (Ill. State Bar No. 6295901)  
24 Counsel for All Plaintiffs  
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