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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KRISTIN M. PERRY, *et al.*,
 Plaintiffs,
 and
 CITY AND COUNTY OF SAN FRANCISCO,
 Plaintiff-Intervenor,
 v.
 ARNOLD SCHWARZENEGGER, *et al.*,
 Defendants,
 and
 PROPOSITION 8 OFFICIAL PROPONENTS
 DENNIS HOLLINGSWORTH, *et al.*,
 Defendant-Intervenors.

CASE NO. 09-CV-2292 VRW

**DECLARATION OF REBECCA JUSTICE
 LAZARUS IN SUPPORT OF PLAINTIFFS'
 ADMINISTRATIVE MOTION TO SEAL
 DOCUMENTS PURSUANT TO CIVIL
 LOCAL RULES 7-11 AND 79-5(D)**

1 I, Rebecca Justice Lazarus, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and in the Northern
3 District of California. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, counsel of
4 record for Plaintiffs Kristin M. Perry, Sandra B. Stier, Paul T. Katami, and Jeffrey J. Zarrillo in the
5 above-captioned matter. I make this declaration in support of Plaintiffs' Administrative Motion to
6 Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(d). The information below is stated on
7 personal knowledge and if called as a witness, I could and would testify competently thereto.

8 2. Attached hereto as Exhibit A is a true and correct copy of an email message from Bill
9 May to Ned Dolejsi, sent on June 25, 2008, with the subject line "Report on Evangelical
10 Teleconference today," and four (4) attachments, Bates numbered DEFINT_PM_005614 –
11 DEFINT_PM_005662.

12 3. Attached hereto as Exhibit B is a true and correct copy of an email message from Bill
13 May to Ron Prentice, sent on June 14, 2008, with the subject line "heads up – 'urgent,'" and two
14 attachments, Bates numbered DEFINT_PM_005767 – DEFINT_PM_005772.

15 4. Attached hereto as Exhibit C is a true and correct copy of an email message from
16 Kenyn Cureton to ronp@californiafamily.org, sent on August 25, 2008, with the subject line "Stand
17 for Marriage Materials," and one attachment, Bates numbered DEFINT_PM_005385 –
18 DEFINT_PM_005399.

19 5. Exhibits A, B, and C were produced by Proponents pursuant to the Court's order
20 requiring the further production of documents, *see* Doc #372 at 5, on Sunday, January 10, 2010 at
21 approximately 12:00 p.m.

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6. A stipulation could not be obtained in this matter because Civil Local Rule 79-5(a) prohibits the sealing of documents or information by agreement of the parties, and therefore the parties are unable to enter into such a stipulation.

I declare, under penalty of perjury under the laws of the United States, that these facts are true and correct and that this Declaration is executed this 12th day of January, 2010, at San Francisco, California.

/s/ Rebecca Justice Lazarus

Rebecca Justice Lazarus

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/s/ Theodore Boutrous, Jr
Theodore Boutrous, Jr.

Exhibit A

(Exhibit lodged with the Court)

Exhibit B

(Exhibit lodged with the Court)

Exhibit C

(Exhibit lodged with the Court)