

# EXHIBIT A

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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 KRISTIN M. PERRY et al,

16 Plaintiffs,

17 vs.

18 ARNOLD SCHWARZENEGGER et al,

19 Defendants,

Case No. 09-CV-2292 VRW

**PLAINTIFFS' AND PLAINTIFF-  
INTERVENOR'S 30(b)(6) AMENDED RE-  
NOTICE OF DEPOSITION OF  
PROTECTMARRIAGE.COM**

**Depo Date Moved to Dec. 17, 2009**

**Trial Date: January 11, 2010**

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Examination Topics

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2 1. The organizational structure of ProtectMarriage.com, including without limitation when  
3 it was created, its purpose, the identity of its significant sponsors and affiliates, and the identity of  
4 employees, independent contractors, and key volunteers, their titles, the time period of their affiliation,  
5 and their responsibilities.

6 2. All meetings regarding campaign strategy in connection with Proposition 8 or messages  
7 to be conveyed to voters regarding Proposition 8, which involved one or more individuals who had  
8 any role in managing or directing ProtectMarriage.com or the Yes on 8 campaign, including without  
9 limitation a June 26, 2008 conference call relating to Proposition 8.  
10

11 3. The drafting of the text of Proposition 8, including without limitation who was  
12 involved, what was discussed, whether any other language or propositions were discussed or  
13 considered, and the reasons why the text of Proposition 8 was selected.

14 4. Drafting the official argument in favor of Proposition 8 and the rebuttal to the official  
15 argument against Proposition 8, including without limitation who was involved with that process, what  
16 was discussed, whether any other language was discussed or considered, and the reasons why the text  
17 of the official argument in favor of Proposition 8 and the rebuttal to the official argument against  
18 Proposition 8 was selected.  
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20 5. The drafting and circulation of all materials posted to <http://www.protectmarriage.com>  
21 or <http://www.protectmarriage.net>, at any time, including without limitation advertisements, resources,  
22 press releases, and strategy documents.  
23

24 6. The creation and airing of all television advertisements relating to Proposition 8,  
25 including without limitation how the messages, themes, or arguments conveyed by the advertisements  
26 were chosen, developed, or implemented, discussions regarding the messages of the advertisements,  
27 who created or assisted in creating each advertisement, the amount spent to air each advertisement, the  
28 targeted audience for each advertisement, and the estimated viewership for each advertisement.

1           7.     The creation and airing of all radio advertisements relating to Proposition 8, including  
2 without limitation how the messages, themes, or arguments conveyed by the advertisements were  
3 chosen, developed, or implemented, discussions regarding the messages of the advertisements, who  
4 created or assisted in creating each advertisement, the amount spent to air each advertisement, the  
5 targeted audience for each advertisement, and the estimated viewership for each advertisement.

6           8.     The creation and airing of all internet advertisements relating to Proposition 8,  
7 including without limitation how the messages, themes, or arguments conveyed by the advertisements  
8 were chosen, developed, or implemented, discussions regarding the messages of the advertisements,  
9 who created each advertisement, the amount spent to air each advertisement, the targeted audience for  
10 each advertisement, and the estimated viewership for each advertisement.

11           9.     The creation and airing of all other communications with voters relating to Proposition  
12 8, including without limitation any recorded calls, phone banks, letter campaigns, the October 2008  
13 bus took, and any door-to-door efforts, and any scripts or talking points provided for use or actually  
14 used during those communications.

15           10.    Coordination and communication with other organizations and churches regarding  
16 campaign strategy in connection with Proposition 8 or messages to be conveyed to voters regarding  
17 Proposition 8, including without limitation the National Organization for Marriage, Focus on the  
18 Family, California Family Council, Family Research Council, the Knights of Columbus, Church of  
19 Jesus Christ of Latter-Day Saints, and/or Colorado for Family Values.

20           11.    The collection of signatures for qualification of Proposition 8, including without  
21 limitation any written materials distributed in connection with that process or scripts provided for use  
22 or actually used with that process.

23           12.    Any and all document preservation policies of ProtectMarriage.com, including the  
24 physical location(s) of where documents are kept and how they are maintained.  
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1           13.    Focus groups relating to Proposition 8, including the identification of all third-parties  
2 used for such focus groups, what was tested, and any responses or findings.

3           14.    Polling relating to Proposition 8, including the identification of all third-parties used for  
4 such polling groups, what was tested, and any responses or findings.  
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**PROOF OF SERVICE**

I, Ronald P. Flynn, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Seventh Floor, San Francisco, CA 94102.

On December 6, 2009, I served the following document(s):

**PLAINTIFFS' AND PLAINTIFF-INTERVENOR'S 30(b)(6) RE-NOTICE OF DEPOSITION OF PROTECTMARRIAGE.COM**

on the following persons at the locations specified:

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25 *Proponents and Protectmarriage.com*

26 in the manner indicated below:

27  **BY UNITED STATES MAIL:** Following ordinary business practices, I sealed true and correct copies of  
28 the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with  
the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's

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Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

**BY FACSIMILE:** Based on a written agreement of the parties to accept service by fax, I transmitted true and correct copies of the above document(s) via a facsimile machine at telephone number Fax # to the persons and the fax numbers listed above. The fax transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine, and a copy of the transmission report  is attached or  will be filed separately with the court.

**BY E-MAIL:** I sent true and correct copies of the above document in PDF format by e-mail to the above addresses.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed December 6, 2009, at San Francisco, California.

/s/

\_\_\_\_\_  
Ronald P. Flynn