

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATURAL RESOURCES DEFENSE)
 COUNCIL, INC.; CENTER FOR SCIENCE)
 IN THE PUBLIC INTEREST; FOOD)
 ANIMAL CONCERNS TRUST; PUBLIC)
 CITIZEN, INC.; and UNION OF)
 CONCERNED SCIENTISTS, INC.,)

Plaintiffs,

v.

UNITED STATES FOOD AND DRUG)
 ADMINISTRATION; MARGARET)
 HAMBURG, in her official capacity as)
 Commissioner, United States Food and Drug)
 Administration; CENTER FOR)
 VETERINARY MEDICINE; BERNADETTE)
 DUNHAM, in her official capacity as)
 Director, Center for Veterinary Medicine;)
 UNITED STATES DEPARTMENT OF)
 HEALTH AND HUMAN SERVICES; and)
 KATHLEEN SEBELIUS, in her official)
 capacity as Secretary, United States)
 Department of Health and Human Services,)

Defendants.

11 CIV 3562 (RMB)
ECF Case

**DECLARATION OF
LINDA LOPEZ**

I, Linda Lopez, declare as follows:

1. I am the director of membership at the Natural Resources Defense Council, Inc. ("NRDC"). I have been the director of membership for twenty-four years.
2. NRDC is a membership organization incorporated under the laws of the State of New York. It is recognized as a not-for-profit corporation under section 501(c)(3) of the United States Internal Revenue Code.

3. NRDC currently has approximately 402,000 members. There are NRDC members residing in each of the fifty United States and in the District of Columbia, including 36,513 in New York.

4. My duties include supervising the preparation of materials that NRDC distributes to members and prospective members. Those materials describe NRDC and identify its mission.

5. NRDC's mission statement declares that "The Natural Resources Defense Council's purpose is to safeguard the Earth: its people, its plants and animals, and the natural systems on which all life depends." It also states that NRDC seeks "to establish sustainability and good stewardship of the Earth as central ethical imperatives of human society" and to "strive to protect nature in ways that advance the long-term welfare of present and future generations."

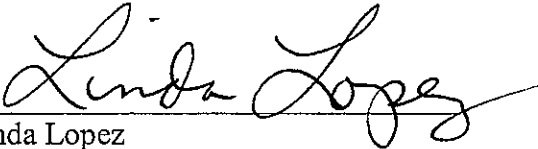
6. NRDC's work on human health issues, as affected by pollutants and other harmful substances generated by human activity and found in the food and products we use and in our environment, embodies the objective of safeguarding the planet's people. NRDC's work on sustainable agriculture embodies the objective of establishing sustainability and good stewardship of the Earth while advancing the long-term welfare of present and future generations. Sustainable agriculture focuses on practices that reduce the risks to human health and the environment.

7. Protecting the public from adverse health effects caused by exposure to harmful substances in the environment, food, and consumer products, including antibiotic-resistant bacteria fostered by the use and misuse of antibiotics in animal feed, is central to NRDC's purpose.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

Dated: New York, New York

July 5, 2011


Linda Lopez