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12 Attorneys for Plaintiffs  
LONG HAUL, INC. and  
13 EAST BAY PRISONER SUPPORT

14 IN THE UNITED STATES DISTRICT COURT  
15 THE NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 LONG HAUL, INC. and EAST BAY ) Case No. C 09-00168-JSW  
18 PRISONER SUPPORT, )  
19 Plaintiffs, )  
20 v. ) **DECLARATION OF PATRICK LYONS**  
21 UNITED STATES OF AMERICA; MITCHELL )  
22 CELAYA; KAREN ALBERTS; WILLIAM )  
23 KASISKE; WADE MACADAM; TIMOTHY J. )  
ZUNIGA; MIKE HART; LISA SHAFFER; )  
24 AND DOES 1-25, )  
Defendants. )

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1           1.       I have personal knowledge of the matters stated in this declaration. If called upon  
2 to do so, I am competent to testify to all matters set forth herein.

3           2.       Attached as Exhibit 1 is a photograph that accurately represents the appearance of  
4 the sign on the EBPS office doorway as of August 27, 2008, the date of the raid.

5           3.       Attached as Exhibit 2 are true and correct copies of documents from the computer  
6 seized from the EBPS office during the raid of August 27, 2008, including a file that contains the  
7 names, addresses, and email addresses of infoshops, distributors, publishers and other groups to  
8 which EBPS distributed prisoner-related literature and from which EBPS received literature and  
9 other materials; two files containing draft outlines and notes related to a proposed article about  
10 political prisoner support that EBPS was asked to write for publication; and a file containing a  
11 draft article memorializing a political prisoner. These documents were produced by Plaintiff  
12 EBPS with BATES stamps EBPS.21-EBPS.30.  
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14           4.       The fact that EBPS disseminated information to prisoners and other members of the  
15 public was described on the EBPS MySpace page at the time of the raid. Attached as Exhibit 3 is  
16 copy of a true and correct copy of the EBPS MySpace page as it appeared in 2010. The “About  
17 Me” description of the organization (see EBPS-3 – EBPS-4) appears the same in this Exhibit as it  
18 did at the time of the raid of August 27, 2008. That description reads in full:  
19

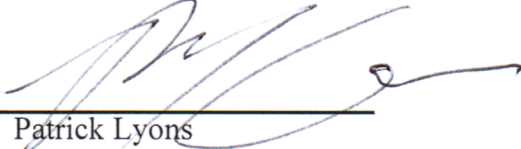
20  
21           East Bay Prisoner Solidarity is a newly formed prison abolition group and a  
22 member of the anarchist black cross network. We provide extensive support for  
prisoners as well as people fighting the prison-industrial complex.

23           The Long Haul Infoshop hosts our prisoner support night on Wednesdays from 7-  
24 8:30pm. We welcome anyone who is interested in participating in such a project.  
25 We have various materials that offer information about political prisoners, prison  
26 conditions, grand jury resistance, security culture, campaigns, event information,  
27 and resources for prisoners. We serve as a resource center that provides  
information about bay area prison abolition and prison support work, as well as  
28 some information on national and international prisoner support activities. We are  
also building a prison-related zine, book, and video library. We also provide  
envelopes and stamps so that we can have pen-pal writing, and send resource  
materials out to prisoners.

1 Some volunteers have been active in Prison Activist Resource Center, and  
2 Anarchist Black Cross. We hope to continue to collaborate with these  
3 organizations and others as we carry on this project. We encourage anyone to join  
4 our group or to send out relevant materials to help our resource library grow. Send  
to 3124 shattuck ave. Berkeley, California 94705. attn: prisoner support Feel free to  
email as well. ebps@riseup.net

5 I declare under penalty of perjury of the laws of the United States of America that the  
6 foregoing is true and correct.

7 Executed January 29, 2010 in Berkeley, California.

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Patrick Lyons  
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