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WILLIAM KASISKE, WADE MACADAM and  
12 TIMOTHY J. ZUNIGA

13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

17 LONG HAUL, INC., and EAST BAY  
PRISONER SUPPORT,

18 Plaintiffs,

19 v.

20 UNITED STATES OF AMERICA;  
21 MITCHELL CELAYA; KAREN  
ALBERTS; WILLIAM KASISKE; WADE  
22 MACADAM; TIMOTHY J. ZUNIGA;  
MIKE HART; LISA SHAFFER; AND  
23 DOES 1-25,

24 Defendants.

Case No. 3:09-cv-0168 JSW

**DECLARATION OF SARA L. ELLIS IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT AND  
DEFENDANTS' CROSS-MOTION FOR  
SUMMARY JUDGMENT/  
ADJUDICATION**

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26 I, SARA L. ELLIS, declare:

27 1. I am an attorney at the law firm of Schiff Hardin LLP, counsel of record for  
28 defendants Mitchell Celaya, Karen Alberts, William Kasiske, Wade MacAdam and

1 Timothy J. Zuniga (the “University Defendants”). I have personal knowledge of the facts  
2 set forth herein and I am willing and able to testify to those facts if called as a witness in  
3 this action.

4 2. Attached as **Exhibit A** is a true and correct copy of selected portions of  
5 Volume I of the transcript of Jesse Palmer’s deposition as Long Haul’s 30(b)(6)  
6 representative, which was taken on August 4, 2010.

7 3. Attached as **Exhibit B** is a true and correct copy of selected portions from  
8 EBPS’s Responses and Objections to Defendant USA’s First Set of Requests for  
9 Admission, dated October 12, 2010.

10 4. Attached as **Exhibit C** is a true and correct copy of selected portions from  
11 Long Haul’s Responses and Objections to Defendant USA’s First Set of Requests for  
12 Admission, dated October 12, 2010.

13 5. Attached as **Exhibit D** is a true and correct of the attachment to Long  
14 Haul’s 2008 taxes, which lists the grants Long Haul paid out in 2008 (pages 7 and 8 of  
15 Exhibit 17 to the deposition of Jesse Palmer). The list shows that Long Haul gave EBPS  
16 a grant of \$75 and Stop Cal Vivisection a grant of \$50 for “Educational – general” in  
17 2008. This document was marked as Exhibit 17 to the deposition of Jesse Palmer on  
18 August 4, 2010 and was authenticated in his testimony located at 159:20-162:4.

19 6. Attached as **Exhibit E** is a true and correct copy of selected portions of the  
20 transcript of Lisa Shaffer’s deposition, which was taken on July 28, 2010.

21 7. Attached as **Exhibit F** is a true and correct copy of selected portions of the  
22 transcript of Max Harris’s deposition, which was taken on September 22, 2010.

23 8. Attached as **Exhibit G** is a true and correct copy of selected portions of the  
24 transcript of Kathryn Miller’s deposition, which was taken on November 10, 2010.

25 9. Attached as **Exhibit H** is a true and correct copy of selected portions of the  
26 transcript of Patrick Lyons’s deposition as East Bay Prisoner Support’s 30(b)(6)  
27 representative, which was taken on September 22, 2010.

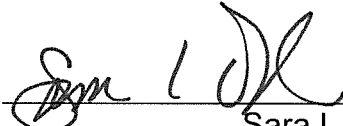
28 10. Attached as **Exhibit I** is a true and correct copy of the front cover and page

1 2 of the Autumn 2008 edition of Slingshot (Issue #98). This edition was produced by  
2 Plaintiffs and BATES numbered SUPPL-11. In the lower left-hand corner of page 2 it  
3 states "Slingshot Newspaper" in bold large type, and the next line it says: "Sponsored  
4 by Long Haul"; next line "3142 Shattuck Avenue, Berkeley, CA 94705."

5 11. In support of their motion Plaintiffs submitted a photo of a news rack as  
6 Exhibit 16 to the declaration of Jesse Palmer. I am informed and believe that this photo  
7 was taken by Plaintiffs' counsel, Jennifer Granick, many days after the August 27, 2008  
8 search of Long Haul.

9 I declare under penalty of perjury under the laws of California that the foregoing is  
10 true and correct.

11 Executed on February 14 2011, in Chicago, Illinois.

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15 Sara L. Ellis

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