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 Pacifica Foundation, Mary Frances Berry,
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 Valerie Chambers, Bertram Lee, and Beth Lyons

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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 15 FOR THE COUNTY OF ALAMEDA

17 THE PEOPLE OF THE STATE OF
 CALIFORNIA, ex rel. CAROL SPOONER,
 18 et al.,

19 Plaintiffs,

20 vs.

21 PACIFICA FOUNDATION, et al.,

22 Defendants.

Case No. 831252-3

**DECLARATION OF CAPTAIN
 WILL PITTMAN IN OPPOSITION
 TO ORDER TO SHOW CAUSE RE
 PRELIMINARY INJUNCTION**

Date: April 10, 2001
 Time: 9:00 a.m.
 Department: 31
 Judge: Hon. Judith Ford

24 I, Will Pittman, declare:

25 1. That the following facts are within my personal knowledge and if called as
 26 a witness, I would be competent to testify thereto.

27 2. I am, and was in 1999, a Captain in the Berkeley Police Department. I was
 28 involved in supervising some of the police response to various activities by demonstrators

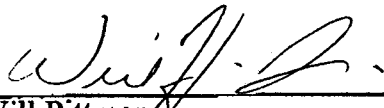
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and others in the Summer of 1999 at the Pacific Foundation ("Pacifica") and KPFA offices located in the 1900 block of Martin Luther King Way.

3. In light of the activities of some demonstrators and concerns of Pacifica employees regarding acts of violence and reported threats of physical harm, I recommended to Lynn Chadwick that Pacifica hire professional security to protect the premises and persons from potential injury, due to the police departments staffing limitations.

4. The credential of each individuals hired by Pacifica were reviewed by me. They were composed of ex-police officers from other jurisdictions.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California, and that this Declaration was executed on 27 day of March, 2001, at Berkeley, California.



Will Pittman

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