

1 Daniel Rapaport (Bar No. 67217)
2 **WENDEL, ROSEN, BLACK & DEAN, LLP**
3 1111 Broadway, 24th Floor
4 Oakland, California 94607-4036
5 Telephone: (510) 834-6600
6 Fax: (510) 834-1928

7 Alan E. Walcher (Bar No. 089717)
8 **EPSTEIN, BECKER & GREEN, P.C.**
9 1875 Century Park East, Suite 500
10 Los Angeles, California 90067-2506
11 Telephone: (310) 556-8861

12 Attorneys for Defendants
13 **PACIFICA FOUNDATION,**
14 **DAVID ACOSTA, MARY FRANCES BERRY,**
15 **LYNN CHADWICK, VALRIE CHAMBERS,**
16 **ANDREA CISCO, ROBERT FARRELL, KEN FORD,**
17 **WENDELL JOHNS, BERTRAM LEE, WILLIAM LUCY,**
18 **BETH LYONS, JUNE MAKELA, FRANK MILLSPAUGH,**
19 **JOHN MURDOCK, MICHEAL PALMER, and**
20 **KAROLYN VAN PUTTEN**

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA

23 THE PEOPLE OF THE STATE OF
24 CALIFORNIA, ex rel. CAROL SPOONER,
25 et al.,

26 Plaintiffs,

27 vs.

28 PACIFICA FOUNDATION, a California
non-profit public benefit corporation and
charitable trust, et al.,

Defendants.

Case No. C 00 3815 MJJ

**DECLARATION OF DANIEL
RAPAPORT IN SUPPORT OF
DEFENDANTS' EXPEDITED
MOTION TO BEGIN LIMITED
DISCOVERY**

Department: Ctrm.: 11 Hon.
Martin J. Jenkins

I, Daniel Rapaport, declare:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of California, and I am admitted to practice before the United States District Court for the Northern District of California. I am a partner in the law firm of Wendel, Rosen,

