

ENDORSED  
FILED  
ALAMEDA COUNTY  
JUN 13 2000  
CLERK OF THE SUPERIOR COURT  
By Columbus Littleberry, Deputy

1 Daniel Rapaport (Bar No. 67217)  
Thiele R. Dunaway (Bar No. 130953)  
2 **WENDEL, ROSEN, BLACK & DEAN, LLP**  
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5 Attorneys for Defendants  
PACIFICA FOUNDATION, MARY FRANCES BERRY,  
6 DAVID ACOSTA, JUNE MAKELA,  
ANDREA CISCO, FRANK MILLSPAUGH,  
7 KEN FORD, MICHEAL PALMER and WILLIAM LUCY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF ALAMEDA

10

11 DAVID ADELSON, LAUREN AYERS,  
MARY BERG, JOANNE BOBB, LYDIA  
12 BRAZON, CECELIA CARUSO, GAIL  
DIXON, ANNE EMERMAN, SHERRY  
13 GENDELMAN, TERRENCE GUY, JIM  
HORWITZ, KAHLIL JACOBS-  
14 FANTAUZZI, DAWUD KHALIL-ULLAH,  
PELE DE LAPPE, STEVE LUSTIG,  
15 ERROL MAITLAND, MIGUEL  
MALDONADO, ANDREW NORRIS,  
16 LEWIS O. SAWYER, JR., MARIALICE  
WILLIAMS, and FRIEDA ZAMES,  
17 individually, and on behalf of others  
similarly situated, and on behalf of Pacifica  
18 Foundation,

19 Plaintiffs,

20 vs.

21 PACIFICA FOUNDATION, a California  
Nonprofit Corporation, MARY FRANCES  
22 BERRY, DAVID ACOSTA, JUNE  
MAKELA, ANDREA CISCO, FRANK  
23 MILLSPAUGH, KEN FORD, MICHEAL  
PALMER, WILLIAM LUCY, and DOES 1-  
24 25, inclusive,

25 Defendants.

Case No. 814461-0

DECLARATION OF  
AMBROSE I. LANE, SR.  
IN OPPOSITION TO MOTION  
FOR PRELIMINARY  
INJUNCTION

Date: June 23, 2000  
Time: 2:00 p.m.  
Department: 31  
Name of Judge: James A. Richman

Wendel, Ros  
1111  
Oakland, California 94607-4036  
k & Dean, LLP  
24<sup>th</sup> Floor

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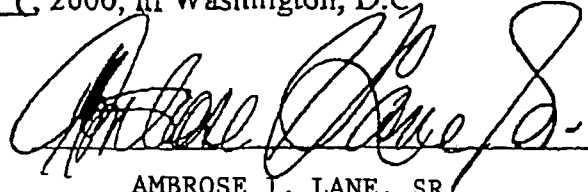
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I, Ambrose I. Lane, Sr. declare:

1. The following information is within my personal knowledge and if sworn as a witness, I could competently testify thereto.

2. From 1989 to 1996, I was a member of the WPFW-FM. Local Advisory Board. During that time, the Local Advisory Board never directly elected any <sup>Pacific Foundation Neth-Bd</sup> director. Our role was solely to nominate directors who were voted upon by the National Board of Directors.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on June 9, 2000, in Washington, D.C.



AMBROSE I. LANE, SR.

Wandel, i  
ack & Dean, LLP  
111, Broadway, 24<sup>th</sup> Floor  
Oakland, California 94607-4006