

1 I, SOPHIA S. COPE, declare as follows:

2 1. I am a member in good standing of the State Bar of California and a member of
3 the bar of this Court. I am also a Staff Attorney and Environmental Advocacy Fellow at the First
4 Amendment Project. I make this declaration based on my personal knowledge, and if called to
5 testify, could and would testify as stated herein.

6 2. Attached as **Exhibit A** is a true and correct copy of a May 5, 2005, North Coast
7 Journal article by Hank Sims entitled “Pepper spray saga ends with victory for plaintiffs, but \$1
8 award points to compromise,” available at
9 <http://www.northcoastjournal.com/050505/news0505.html>, and printed on July 16, 2005.

10 3. Attached as **Exhibit B** is a true and correct copy of an excerpt (pages 73-84) of
11 the deposition of Don Cameron, conducted on February 3, 2005.

12 4. Attached as **Exhibit C** is a true and correct copy of an October 8, 1998, Santa
13 Rosa Press Democrat article by Mike Geniella entitled “Logging Foes Pepper-Sprayed,
14 Humboldt Authorities Raid Earth First! Camp,” available at <http://www.pressdemocrat.com>, and
15 printed on June 28, 2005.

16 5. Attached as **Exhibit D** is a true and correct copy of a June 24, 2005, letter from
17 Plaintiffs’ fee counsel Sophia Cope to Defendants’ counsel Nancy Delaney requesting
18 information about pepper spray uses by Defendants since the beginning of the lawsuit.

19 6. Attached as **Exhibit E** is a true and correct copy of a June 28, 2005, letter from
20 Defendants’ counsel Nancy Delaney to Plaintiffs’ fee counsel Sophia Cope in response to the
21 June 24, 2005, letter, attached as Exhibit D.

22 7. Attached as **Exhibit F** is a true and correct copy of information about Humboldt
23 County’s membership in the California State Association of Counties Excess Insurance
24 Authority (CSAC-EIA), available at <http://www.csac-eia.org/index.cfm?pageid=72&id=63>, and
25 printed on July 16, 2005.

26 8. Attached as **Exhibit G** is a true and correct copy of information about the CSAC-
27 EIA Excess Liability Program, available at <http://www.csac-eia.org/index.cfm?pageid=79>, and
28 printed on July 16, 2005.

1 9. Attached as **Exhibit H** is a true and correct copy of the a chart explaining the
2 CSAC-EIA Excess Liability Program, available at [http://www.csac-
eia.org/index.cfm?pageid=363](http://www.csac-
3 eia.org/index.cfm?pageid=363), and printed on July 16, 2005.

4 10. Attached as **Exhibit I** is a true and correct copy of an excerpt of the deposition of
5 Kimberly Kerr, the Humboldt County Risk Manager, conducted on March 17, 1998.

6 11. Attached as **Exhibit J** is a true and correct copy of a July 8, 2005, letter from
7 Plaintiffs' fee counsel Sophia Cope to Defendants' counsel Nancy Delaney requesting
8 information about Defendants' insurance policies.

9 12. Attached as **Exhibit K** is a true and correct copy of a July 8, 2005, letter from
10 Defendants' counsel Nancy Delaney to Plaintiffs' fee counsel Sophia Cope in response to the
11 July 8, 2005, letter, attached as Exhibit J.

12 13. Attached as **Exhibit L** is a true and correct copy of electronic mail
13 correspondence I had with a Reference Attorney at the California Office of Administrative Law
14 on June 15-16, 2005.

15 I declare under penalty of perjury that the foregoing is true and correct to the best of my
16 knowledge.

17 Executed this 20th day of July 2005, in Oakland, California.

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19 _____
20 Sophia S. Cope
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