

Exhibit L

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 PROJECT OF CALIFORNIA RENEWAL

18 * Admitted *pro hac vice*

19
 20 **UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

21 KRISTIN M. PERRY, SANDRA B. STIER,
 22 PAUL T. KATAMI, and JEFFREY J.
 ZARRILLO,

23 Plaintiffs,

24 v.

25 ARNOLD SCHWARZENEGGER, in his official
 26 capacity as Governor of California; EDMUND
 27 G. BROWN, JR., in his official capacity as At-
 28 torney General of California; MARK B. HOR-

CASE NO. 09-CV-2292 VRW

**DECLARATION OF HAK-SHING
 WILLIAM TAM IN SUPPORT OF
 DEFENDANT-INTERVENORS' MO-
 TION FOR A PROTECTIVE ORDER**

Date: September 25, 2009
 Time: 10:00AM
 Judge: Chief Judge Vaughn R. Walker
 Location: Courtroom 6, 17th Floor

1 TON, in his official capacity as Director of the
2 California Department of Public Health and State
3 Registrar of Vital Statistics; LINETTE SCOTT,
4 in her official capacity as Deputy Director of
5 Health Information & Strategic Planning for the
6 California Department of Public Health; PA-
7 TRICK O'CONNELL, in his official capacity as
8 Clerk-Recorder for the County of Alameda; and
9 DEAN C. LOGAN, in his official capacity as
10 Registrar-Recorder/County Clerk for
11 the County of Los Angeles,

12 Defendants,

13 and

14 PROPOSITION 8 OFFICIAL PROPONENTS
15 DENNIS HOLLINGSWORTH, GAIL J.
16 KNIGHT, MARTIN F. GUTIERREZ, HAK-
17 SHING WILLIAM TAM, and MARK A. JANS-
18 SON; and PROTECTMARRIAGE.COM – YES
19 ON 8, A PROJECT OF CALIFORNIA RE-
20 NEWAL,

21 Defendant-Intervenors.

22 Additional Counsel for Defendant-Intervenors

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* Admitted *pro hac vice*

I, Hak-Shing William Tam, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a resident of California over 18 years of age, and my statements herein are based on personal knowledge.

1 2. I am one of the Official Proponents of the California ballot measure in 2008 known as
2 Proposition 8. I am also a Defendant-Intervener in this case. As an official proponent I had private
3 communications regarding political strategy and my own personal political and moral views with
4 other members of ProtectMarriage.com and the campaign.

5 3. In addition to being an Official Proponent, I volunteered as the head of a coalition of
6 Asian churches whose membership also had an interest in the passage of Proposition 8. The
7 coalition communicated with interested churches about the campaign and encouraged them to get
8 out and vote. As the head of this coalition, I had numerous private communications reflecting mine
9 and others' deeply held political and religious views and our thoughts on political strategy and
10 petitioning the government. I engaged in these communications as part of this coalition, not in my
11 capacity as an official proponent of Proposition 8. I am very concerned that Plaintiffs' broad
12 discovery requests make no distinction in this regard and would require me to produce all such
13 private communications because they were between me and a "third-party."

14 4. If I am required to disclosure such communications, whether the non-public communi-
15 cations I had as an official proponent or the communications I had as the head of a coalition inter-
16 ested in Proposition 8, it would affect how I communicate in the future. I would change what I say,
17 who I feel I can speak to, and who I associate with for fear that such communications would not
18 remain private as they were intended.

19 5. I am also concerned about disclosing such communications because I am aware of
20 many instances of harassment and retaliation against supporters of Proposition 8 that occurred after
21 their support for the ballot initiative or their affiliation with Protect Marriage became public. For
22 example, a friend in my church was beaten by a person when he was passing out "Yes on 8" flyers.
23 Another friend's house was vandalized with spray paint graffiti. Another friend's name was put
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1 online as a donor to Proposition 8. Her boss saw the webpage and warned her about supporting
2 Proposition 8. A good number of friends got their Proposition 8 yard signs stolen or vandalized.

3 6. I personally experienced harassment and retaliation due to my affiliation with Protect
4 Marriage. My car was vandalized. In response to public communications I made regarding Propo-
5 sition 8, I was called derogatory names, threatened to be killed, and told to leave the country.
6

7 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
8 AND CORRECT.

9 Executed on September 15, 2009

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11 _____
12 Hak-Shing William Tam

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