

# Exhibit M

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 GAIL J. KNIGHT, MARTIN F. GUTIERREZ, HAK-SHING WILLIAM TAM,  
 17 MARK A. JANSSON, and PROTECTMARRIAGE.COM – YES ON 8, A  
 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 offi-  
 26 cial capacity as Governor of California; ED-  
 27 MUND G. BROWN, JR., in his official capaci-  
 28 ty as Attorney General of California; MARK

CASE NO. 09-CV-2292 VRW

**DECLARATION OF SARAH  
 TROUPIS IN SUPPORT OF DE-  
 FENDANT-INTERVENORS' MO-  
 TION FOR A PROTECTIVE OR-  
 DER**

Date: September 25, 2009  
 Time: 10:00 a.m.  
 Judge: Chief Judge Vaughn R. Walker

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

13 Defendants,

14 and

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

22 Defendant-Intervenors.

Location: Courtroom 6, 17th Floor

23 Additional Counsel for Defendant-Intervenors

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1 I, Sarah E. Troupis, make the following declaration pursuant to 28 U.S.C. § 1746:

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

4 2. This declaration is made in support of Defendant-Intervenors' motion for a protective  
5 order.

6 3. ProtectMarriage.com is a Defendant-Intervenor in this case.

7 4. I am an attorney who represents ProtectMarriage.com as a plaintiff in another case—a  
8 lawsuit challenging various election disclosure provisions of California law. The case is styled as  
9 *ProtectMarriage.com v. Bowen*, No. 09-0058 (E.D. Cal., filed Jan. 7, 2009).  
10

11 5. One of ProtectMarriage.com's assertions in the *Bowen* case is that California laws re-  
12 quiring the public disclosure of the identity of certain referendum campaign donors violate the  
13 First Amendment by chilling core political speech. As part of its factual showing in that case,  
14 ProtectMarriage.com has submitted nearly 60 declarations of individuals who attested to harass-  
15 ment and threats leveled against them because of their support of traditional marriage.  
16

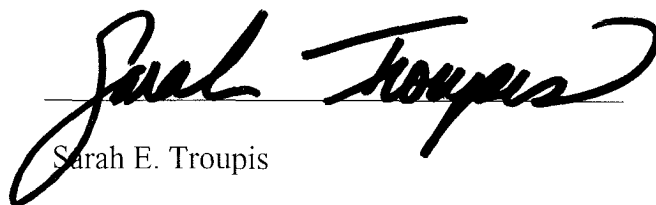
17 6. I was the attorney responsible for collecting these declarations. As part of that  
18 process, I spoke with each of the declarants, who reported to me many instances of harassment and  
19 threats as a result of their support for Prop. 8.  
20

21 7. True and correct copies of those declarations, as filed in the *Bowen* case, are available  
22 on the District Court for Eastern District of California's PACER website. *See* Docs # 32-33, 35-  
23 40, 45, 113-162, *ProtectMarriage.com v. Bowen*, No. 09-00058 (E.D. Cal. filed Jan. 9, 2009). The  
24 declarations of Does 1 through 9 were filed in support of ProtectMarriage.com's motion for a  
25 preliminary injunction. The majority of the declarations—those of Does 10 through 58—were  
26 filed in support of ProtectMarriage.com's motion for summary judgment.  
27  
28

1           8. I have had several other individuals who support traditional marriage come to me with  
2 incidents of harassment and threats they suffered because of their support for traditional marriage.  
3 Even though we have a protective order in place in the *Bowen* case that allows individuals to  
4 submit declarations under seal, these individuals were unwilling to submit declarations because of  
5 the fear that, despite the protective order, their names would become public knowledge and they  
6 would be subject to further threats and harassment.  
7

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

Executed on September 15, 2009



Sarah E. Troupis