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

20 KRISTIN M. PERRY, *et al.*,
 21 Plaintiffs,
 and
 22 CITY AND COUNTY OF SAN FRANCISCO,
 23 Plaintiff-Intervenor,
 v.
 24 ARNOLD SCHWARZENEGGER, *et al.*,
 25 Defendants,
 and
 26 PROPOSITION 8 OFFICIAL PROPONENTS
 27 DENNIS HOLLINGSWORTH, *et al.*,
 28 Defendant-Intervenors.

CASE NO. 09-CV-2292 VRW

**DECLARATION OF REBECCA JUSTICE
 LAZARUS IN SUPPORT OF PLAINTIFFS'
 ADMINISTRATIVE MOTION TO SEAL
 DOCUMENTS PURSUANT TO CIVIL
 LOCAL RULES 7-11 AND 79-5(D)**

1 I, Rebecca Justice Lazarus, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and in the Northern
3 District of California. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, counsel of
4 record for Plaintiffs Kristin M. Perry, Sandra B. Stier, Paul T. Katami, and Jeffrey J. Zarrillo in the
5 above-captioned matter. I make this declaration in support of Plaintiffs' Administrative Motion to
6 Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(d). The information below is stated on
7 personal knowledge and if called as a witness, I could and would testify competently thereto.

8 2. Plaintiffs will submit to the Clerk of the Court, in sealed envelopes, two copies of (1)
9 Plaintiffs' Motion to Reopen Deposition of Ronald Prentice and (2) Ms. Justice Lazarus' Declaration
10 in Support of Plaintiffs' Motion to Reopen Deposition of Ronald Prentice and supporting exhibits.

11 3. Plaintiffs have filed on the electronic docket a redacted copy of Plaintiffs' Motion to
12 Reopen Deposition of Ronald Prentice. The redacted portion of these documents include references
13 or descriptions of documents designated by Defendant-Intervenors as "Highly Confidential –
14 Attorneys' Eyes Only."

15 4. Plaintiffs have filed on the electronic docket a copy of Ms. Justice Lazarus'
16 Declaration in Support of Plaintiffs' Motion to Reopen Deposition of Ronald Prentice which does not
17 include supporting exhibits that were designated by Defendant-Intervenors as "Highly Confidential –
18 Attorneys' Eyes Only."

19 5. Exhibits C, D, F, and H were produced by Proponents between January 10 and 17,
20 2010, pursuant to the Court's order requiring the further production of documents, *see* Doc #372 at 5.

21 6. A stipulation could not be obtained in this matter because Civil Local Rule 79-5(a)
22 prohibits the sealing of documents or information by agreement of the parties, and therefore the
23 parties are unable to enter into such a stipulation.

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1 I declare, under penalty of perjury under the laws of the United States, that these facts
2 are true and correct and that this Declaration is executed this 19th day of January, 2010, at San
3 Francisco, California.

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5 _____ /s/ Rebecca Justice Lazarus
6 Rebecca Justice Lazarus
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ATTESTATION PURSUANT TO GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the Northern District of California, I attest that concurrence in the filing of the document has been obtained from each of the other signatories to this document.

/s/ Ethan Dettmer

Ethan Dettmer

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