

**PORTER | SCOTT**

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THE NATIONAL GRANGE OF THE ORDER OF PATRONS OF HUSBANDRY

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN THE COUNTY OF SACRAMENTO**

THE NATIONAL GRANGE OF THE  
ORDER OF PATRONS OF HUSBANDRY, a  
Washington, D.C. nonprofit corporation,

Plaintiff,

v.

THE CALIFORNIA STATE GRANGE, a  
California nonprofit corporation, and  
ROBERT McFARLAND, JOHN LUVAAS,  
GERALD CHERNOFF and DAMIAN PARR,

Defendants.

Case No. 2012-00130439

**DECLARATION OF BOB CLOUSE IN  
SUPPORT OF REPLY REGARDING  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION  
[Code of Civil Procedure §§ 526, 527]**

Date: October 17, 2012

Time: 2:00 p.m.

Dept: 53

Complaint Filed: October 1, 2012

I, Bob Clouse, declare:

1. I served as Master of the California State Grange from 1993 to 1997. As such, I have personal knowledge of the facts alleged herein and, if called, could testify competently as to them. Master was the highest ranking office in the California State Grange.

2. During my terms as Master for the California State Grange, I prepared the agenda for and conducted the meetings of the Executive Committee. We attempted at all times to follow the By-

1 Laws of the National Grange, which are expressly incorporated by the By-Laws of the California State  
2 Grange.

3 3. The Executive Committee consisted of five elected members, plus myself as Master.  
4 The Overseer sat as an ex-officio member, but had no vote. The members of the Executive Committee  
5 were also designated as the members of the Board of Directors for the California State Grange as  
6 nonprofit corporation.

7 4. The Executive Committee and the Board of Directors could be referred to  
8 interchangeably, and there were no separate meetings held for the corporate Board.

9 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
10 is true and correct and that this declaration was executed on October 11, 2012 at Sacramento County,  
11 California.

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14 \_\_\_\_\_  
15 Bob Clouse  
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1 Re: **National Grange, et al. v. Bob McFarland**  
2 Case No: **Sacramento County Superior Court 34-2012-00130439**

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3 **DECLARATION OF SERVICE**

4 I am a citizen of the United States and a resident of Sacramento County, California. I am over  
5 the age of eighteen years and not a party to the within above-entitled action. My business address is  
6 350 University Avenue, Suite 200, Sacramento, California.

7 I am familiar with this Company's practice whereby the mail, after being placed in a  
8 designated area, is given the appropriate postage and is deposited in a U. S. mailbox in the City of  
9 Sacramento, California, after the close of the day's business.

10 On October 12, 2012, I served a copy of the following document(s):

11 **DECLARATION OF BOB CLOUSE IN SUPPORT OF REPLY REGARDING**  
12 **PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

13 on all parties in the said action as addressed below by causing a true copy thereof to be:

14 **Attorneys for Robert McFarland**

15 Mark Ellis  
16 Ellis Law Group  
17 740 University Ave., Suite 100  
18 Sacramento, CA 95814  
19 [MEllis@EllisLawGrp.com](mailto:MEllis@EllisLawGrp.com)

20 **Attorneys for Defendants The California**

21 **State Grange, John Luvaas, Gerald**

22 **Chernoff, and Damian Parr**

23 Robert D. Swanson  
24 Daniel S. Stouder  
25 BoutinJones  
26 555 Capitol Mall, Suite 1500  
27 Sacramento, CA 95814  
28 [rswanson@boutinjones.com](mailto:rswanson@boutinjones.com)  
[dstouder@boutinjones.com](mailto:dstouder@boutinjones.com)

✓ **By Mail.** I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Sacramento, California.

\_\_\_\_\_ **By Personal Service.** I caused such document to be delivered by hand to person(s) listed below.


\_\_\_\_\_ **By Overnight Delivery.** I caused such document to be delivered by overnight delivery to the office of the person(s) listed below.

\_\_\_\_\_ **By Facsimile.** I caused such document to be transmitted by facsimile machine to the office of the person(s) listed below.

✓ **By E-Mail.** I caused such document to be transmitted by electronic format to the office of the person(s) listed below.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed at Sacramento, California on October 12, 2012.

27   
28 \_\_\_\_\_  
Desiree Ganzon