

1 **P O R T E R | S C O T T**

2 A PROFESSIONAL CORPORATION

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10 THE NATIONAL GRANGE OF THE ORDER OF PATRONS OF HUSBANDRY

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

12 **IN THE COUNTY OF SACRAMENTO**

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

16 Plaintiff,

17 v.

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

22 Defendants.

Case No. 2012-00130439

**DECLARATION OF RANDALL A. LEWIS
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

23 I, Randall A. Lewis, declare:

24 1. I served as Master of the California State Grange from 2006 to 2009, immediately prior
25 to Robert McFarland. As such, I have personal knowledge of the facts alleged herein and, if called,
26 could testify competently as to them. Master was the highest ranking office in the California State
27 Grange.

28 2. During my terms as Master for the California State Grange, I assisted in the preparation
of the agenda for and participated in all of the meetings of the Executive Committee. We attempted at

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

3 3. The Executive Committee consisted of five elected members, plus the Master and
4 Overseer, who together functioned as the Board of Directors for the California State Grange as
5 nonprofit corporation.

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

8 I declare under the penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct and that this declaration was executed on October 12, 2012 in Los Angeles County,
10 California.

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14 Randall A. Lewis
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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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4 **DECLARATION OF SERVICE**

5 I am a citizen of the United States and a resident of Sacramento County, California. I am over
6 the age of eighteen years and not a party to the within above-entitled action. My business address is
7 350 University Avenue, Suite 200, Sacramento, California.

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

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

12 **DECLARATION OF RANDALL A. LEWIS IN SUPPORT OF REPLY REGARDING**
13 **PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

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

15 **Attorneys for Robert McFarland**

16 Mark Ellis
17 Ellis Law Group
18 740 University Ave., Suite 100
19 Sacramento, CA 95814
20 MEllis@EllisLawGrp.com


21 **Attorneys for Defendants The California**
22 **State Grange, John Luvaas, Gerald**
23 **Chernoff, and Damian Parr**

24 Robert D. Swanson
25 Daniel S. Stouder
26 BoutinJones
27 555 Capitol Mall, Suite 1500
28 Sacramento, CA 95814
rswanson@boutinjones.com
dstouder@boutinjones.com

- 29 ☒ **By Mail.** I caused such envelope with postage thereon fully prepaid to be placed in the United
30 States mail at Sacramento, California.
31 ☐ **By Personal Service.** I caused such document to be delivered by hand to person(s) listed
32 below.
33 ☐ **By Overnight Delivery.** I caused such document to be delivered by overnight delivery to the
34 office of the person(s) listed below.
35 ☐ **By Facsimile.** I caused such document to be transmitted by facsimile machine to the office
36 of the person(s) listed below.
37 ☒ **By E-Mail.** I caused such document to be transmitted by electronic format to the office of
38 the person(s) listed below.

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

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

41 
42 _____
43 Desiree Ganzon