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LEGAL PROCESS #2

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO
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11 THE NATIONAL GRANGE OF THE ORDER
OF PATRONS OF HUSBANDRY, a
12 Washington, D.C., nonprofit corporation,

13 Plaintiff,

14 v.

15 THE CALIFORNIA STATE GRANGE, a
California nonprofit corporation, and ROBERT
16 MCFARLAND, JOHN LUVAAS, GERALD
CHERNOFF, and DAMINA PARR,

17 Defendants.
18

19 ROBERT MCFARLAND, an individual,

20 Cross-Complainant,

21 v.

22 THE NATIONAL GRANGE OF THE ORDER
OF PATRONS OF HUSBANDRY, a
Washington, D.C., nonprofit corporation, and
23 MARTHA STEFENONI, an individual, and
EDWARD L. LUTTRELL, an individual, and
24 SHIRLEY BAKER, and individual, and DOES 1-
10, inclusive,

25 Cross-Defendants.
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Case No.: 34-2012-00130439

**DECLARATION OF CHERI BUNKER IN
SUPPORT OF OPPOSITION TO CROSS-
DEFENDANTS MARTHA STEFENONI AND
SHIRLEY BAKER'S SPECIAL MOTION TO
STRIKE**

DATE: October 29, 2013
TIME: 2:00 p.m.
DEPT: 53

Hon. David Brown

Complaint Filed: October 1, 2012
Trial Date: None set

1 I, Cheri Bunker, hereby declare that:

2 1. At all relevant times mentioned herein, I was one of three Grange members who
3 investigated the public distribution of Edward Luttrell's February 7, 2012 letter. The facts stated in this
4 declaration are true and correct and based on my own personal knowledge, and if called upon to testify
5 thereto, I am competent to do so.

6 2. After the public dissemination of Edward Luttrell's February 7, 2012 letter, I along with
7 two other Grange members were asked by the Executive Committee to conduct an investigation into
8 how and who sent Luttrell's letter to numerous California State Grange members.

9 3. As part of the investigation I interviewed Martha Stefenoni. During that interview, Mrs.
10 Stefenoni admitted that she thought the February 7, 2012 letter should have been kept confidential as it
11 related to a personnel matter. A true and correct copy of my interview notes taken during Mrs.
12 Stefenoni's questioning is attached as **Exhibit F** to the Index of Exhibits.

13 4. As a result of the investigation, the three person committee authored a brief report on
14 the information discovered during the investigation. At the time, no Executive Committee members
15 admitted to publicly disclosing the February 7, 2012 letter.

16 5. The information discovered that all but two Executive Committee members believed
17 that the February 7, 2012 letter was meant to be kept confidential and should not have been distributed.
18 However, Shirley Baker refused to be interviewed. A true and correct copy of the Committee's report
19 regarding the February 7, 2012 letter is attached as **Exhibit G** to the Index of Exhibits.

20 6. I was also Secretary for the California State Grange Annual Convention in 2011 which
21 took place in Palermo, California. I was present at all times at the Grange Convention. I do not recall
22 any mention of the investigation being made by either Shirley Baker or Martha Stefenoni at the
23 Convention. In my role as Secretary, I was responsible for recording all the announcements and
24 discussions which occurred on the floor of the Convention into the CSG Journal. As part of my
25 responsibilities and duties as Secretary of the California State Grange, I created the Journal which
26 reflects all the announcements and discussions made at the 2011 CSG Convention. Attached as
27 **Exhibit M** to the Index of Exhibits is a true and correct copy of the Journal of Proceedings from the
28 139th Annual Session of California State Grange – 2011.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed on October 14, 2013, in Sacramento,
3 California.

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CHERI BUNKER