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LEGAL PROCESS #2

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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO

10
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.
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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

**OBJECTION TO THE DECLARATION OF
MARTHA STEFENONI FILED IN SUPPORT
OF 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

28 Cross-Complainant Robert McFarland hereby makes the following objections to the

1 Declaration of Martha Stefenoni filed in support of Cross-Defendants Martha Stefenoni and Shirley
2 Baker's Special Motion to Strike.

Evidence Objected To	Grounds For Objection	Court's Ruling
<p>¶14 at 4:10-13</p> <p>On or about October 11, 2011 National Grange Master Ed Luttrell directed the Executive Committee of the State Grange to look into the actions of California State Grange Master Robert McFarland relating to (1) chartering applications, (2) seating of alternate delegates, and (3) workplace environment complaints.</p>	<p>Lacks foundation; Speculative; Conclusory</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
<p>¶15 at 4:14-15</p> <p>The Executive Committee conducted its investigation and a majority of the committee issued a report to National Grange Master Ed Luttrell in January 2012.</p>	<p>Lacks foundation; Speculative; Conclusory</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

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19 Dated: October 16, 2013

20 ELLIS LAW GROUP, LLP

21 By 

22 William A. Lapcevic

23 Attorney for

24 DEFENDANT/CROSS COMPLAINANT ROBERT
25 MCFARLAND
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