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15 ATTORNEYS FOR DEFENDANT-INTERVENORS DENNIS HOLLINGSWORTH,
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 16 PROTECTMARRIAGE.COM – YES ON 8, A
 PROJECT OF CALIFORNIA RENEWAL

17 * Admitted *pro hac vice*

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

20 KRISTIN M. PERRY, SANDRA B. STIER,
 PAUL T. KATAMI, and JEFFREY J.
 21 ZARRILLO,

22 Plaintiffs,

23 v.

24 ARNOLD SCHWARZENEGGER, in his official
 25 capacity as Governor of California; EDMUND
 26 G. BROWN, JR., in his official capacity as At-
 27 torney General of California; MARK B. HOR-
 28 TON, in his official capacity as Director of the
 California Department of Public Health and State

CASE NO. 09-CV-2292 VRW

**DECLARATION OF RONALD
 PRENTICE IN SUPPORT OF DE-
 FENDANT-INTERVENORS PROPO-
 SITION 8 PROPONENTS AND PRO-
 TECTMARRIAGE.COM'S OPPOSI-
 TION TO PLAINTIFFS' MOTION
 FOR LEAVE TO REOPEN THE DE-
 POSITION OF RONALD PRENTICE**

1 Registrar of Vital Statistics; LINETTE SCOTT,
2 in her official capacity as Deputy Director of
3 Health Information & Strategic Planning for the
4 California Department of Public Health; PA-
5 TRICK O'CONNELL, in his official capacity as
6 Clerk-Recorder for the County of Alameda; and
7 DEAN C. LOGAN, in his official capacity as
8 Registrar-Recorder/County Clerk for
9 the County of Los Angeles,

10
11 Defendants,

12 and

13 PROPOSITION 8 OFFICIAL PROPONENTS
14 DENNIS HOLLINGSWORTH, GAIL J.
15 KNIGHT, MARTIN F. GUTIERREZ, HAK-
16 SHING WILLIAM TAM, and MARK A. JANS-
17 SON; and PROTECTMARRIAGE.COM – YES
18 ON 8, A PROJECT OF CALIFORNIA RE-
19 NEWAL,

20 Defendant-Intervenors.

21
22 Additional Counsel for Defendant-Intervenors

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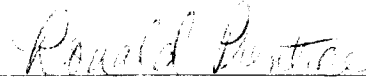
1 I, Ronald Prentice, make the following declaration pursuant to 28 U.S.C. § 1746:

2 1. I am a resident of California over 18 years of age, and my statements herein are based
3 on personal knowledge and if called as a witness, I could and would testify competently thereto.

4 2. I submit this declaration in response to Plaintiffs' Motion for Leave to Reopen my de-
5 position in order to clarify certain testimony at my deposition that was incorrect. Specifically, at
6 my deposition I testified in response to the question "was there a steering committee for Protect-
7 Marriage.com" that there was not. *See* Justice Lazarus Decl. ¶ 3, Ex. B at 97 4-13. While there
8 was no entity known as a "Steering Committee" that had managerial or strategic decision-making
9 authority over ProtectMarriage.com, there was a group of individuals (to my knowledge there was
10 never a defined list) that has been referred to as a Steering Committee who would receive informa-
11 tion about the Campaign and offer information to the Campaign in return. I regret that my failure
12 to recall this group at my deposition and provide appropriate elaboration caused my testimony to be
13 incorrect. It was not my intention to mislead but rather to not suggest that anyone other than the ad
14 hoc executive committee of ProtectMarriage.com or the vendors to whom certain responsibilities
15 had been delegated had the authority or ability to make decisions for the official Yes on 8 Cam-
16 paign. Focusing on that point, I failed to recall the existence of the Steering Committee at my
17 deposition.

18 3. While I sincerely regret my inaccurate testimony, I also must place it in context. I only
19 personally recall using the term "Steering Committee" to refer to the group described above one
20 time, and I did not recall that during my deposition. To the best of my knowledge and recollection,
21 I also only participated in one phone call with this group that lasted maybe fifteen minutes while I
22 was in an airport. I do not now, nor have I ever, thought of this group as a "Steering Committee" as
23 that term is commonly used and understood, but again I must acknowledge that a group referred to
24 by that name did exist and my testimony to the contrary was wrong.

1 I declare under penalty of perjury that the foregoing is true and correct, and that this decla-
2 ration was executed in San Francisco, California on January 20, 2010.
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6 Ronald Prentice
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