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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SEP 21 2010

John A. Clarke, Executive Officer/Clerk

BY Raul Sanchez Deputy

8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10
11 **AMERICAN FREEDOM ALLIANCE** a
12 nonprofit corporation;

13 Plaintiff

14 vs.

15 **CALIFORNIA SCIENCE CENTER** a legal
16 entity of the State of California;

17 **CALIFORNIA SCIENCE CENTER**

18 **FOUNDATION** a nonprofit corporation;

19 **JEFFREY RUDOLPH** an Individual and

20 **DOES 1 through 50** inclusive;

21 Defendants.

Case No. BC423687 **D**

Assigned to: The Hon. Terry A. Green
Dept. 14

**NOTICE OF ASSERTION OF
ATTORNEY-CLIENT PRIVILEGE BY
DISCOVERY INSTITUTE;
DECLARATION OF BRUCE K.
CHAPMAN**

BY FAX

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1 TO THE HONORABLE COURT, THE PARTIES AND TO THEIR ATTORNEYS OF
2 RECORD HEREIN:

3 Pursuant to California *Evidence Code* § 953 and the Court's Order of August 5, 2010,
4 Plaintiff American Freedom Alliance ("Plaintiff") hereby submits the Declaration of Bruce K.
5 Chapman, attached hereto as Exhibit "A," in support of Plaintiff's Opposition to the Motion to
6 Compel Further Documents filed herein by Defendants California Science Center Foundation
and Jeffrey Rudolph.

7 DATED: September 16, 2010

THE BECKER LAW FIRM

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9 By:


10 WILLIAM J. BECKER JR. ESQ.
11 Attorneys for Plaintiffs AMERICAN FREEDOM
12 ALLIANCE
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1 PROOF OF SERVICE

2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES) SS:

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action; my business address is: 11500 Olympic Blvd., Suite 400,
6 Los Angeles, California 90064. On September 16, 2010, I served the foregoing documents:

7 **NOTICE OF ASSERTION OF ATTORNEY-CLIENT
8 PRIVILEGE BY DISCOVERY INSTITUTE**

8 The above-referenced document was served on:

9 Allan S. Ono, Esq.
10 Deputy Attorney General
11 Natural Resources Law Section
12 OFFICE OF THE ATTORNEY GENERAL
13 300 S. Spring Street, 11th Floor
14 North Tower
15 Los Angeles, CA 90013
16 E-mail: allan.ono@doj.ca.gov

Attorneys for Defendants, **California Sci-
ence Center** and **Jeffrey Rudolph** in his
official capacity as president and CEO of
the California Science Center

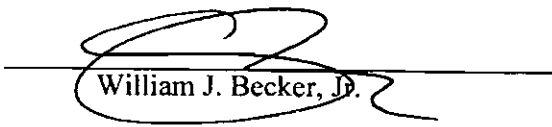
14 Patrick W. Dennis, Esq.
15 James Zelaney, Esq.
16 GIBSON, DUNN & CRUTCHER
17 Los Angeles Office
18 333 South Grand Avenue
19 Los Angeles, CA 90071-3197
20 E-mails: PDennis@gibsondunn.com;
21 JZelanay@gibsondunn.com

Attorneys for Defendants, **California Sci-
ence Center Foundation** and **Jeffrey Ru-
dolph** in his official capacity as President
of the California Science Center Founda-
tion

20 ☒ **BY U.S. MAIL:** As follows: I am "readily familiar" with the firm's practice of collection
21 and processing correspondence for mailing. Under that practice it would be deposited with U.S.
22 postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in
the ordinary course of business. I am aware that on motion of the party served, service is pre-
sumed invalid if postal cancellation date or postage meter date is more than one day after date of
deposit for mailing in affidavit.

23 ☒ (State) I declare under penalty of perjury under the laws of the State of California that
24 the above is true and correct.

25 Executed on September 16, 2010, at Los Angeles, California.

26
27 
28 William J. Becker, Jr.