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CENTER FOUNDATION and JEFFREY
RUDOLPH, individually and in his official capacity
as President of the California Science Center
Foundation

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

MAR 15 2011

John A. Clarke, Executive Officer/Clerk
BY Mary Flores, Deputy
Mary Flores

SUPERIOR COURT, STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CENTRAL DISTRICT

AMERICAN FREEDOM ALLIANCE, a
nonprofit corporation;

Plaintiff,

v.

CALIFORNIA SCIENCE CENTER; a legal
entity of the State of California; CALIFORNIA
SCIENCE CENTER FOUNDATION, a
nonprofit corporation; JEFFREY RUDOLPH, an
individual; and DOES 1 through 50, inclusive;

Defendants.

CASE NO. BC 423687

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

**DECLARATION OF JEFFREY N.
RUDOLPH IN SUPPORT OF DEFENDANTS
CALIFORNIA SCIENCE CENTER
FOUNDATION'S AND JEFFREY
RUDOLPH'S (AS PRESIDENT OF THE
FOUNDATION AND IN HIS INDIVIDUAL
CAPACITY) MOTION FOR SUMMARY
ADJUDICATION ON AMERICAN
FREEDOM ALLIANCE'S CLAIMS
ASSERTED UNDER THE UNITED STATES
CONSTITUTION AND CALIFORNIA
CONSTITUTION**

[Notice; Separate Statement; Memorandum of Points
and Authorities in Support Thereof; Appendix of
Non-California Authorities; Declaration of Cynthia
Pygin; Declaration of Jeremy S. Ochsenbein; and
[Proposed] Order filed concurrently herewith]

DATE OF FILING
OF ORIGINAL

COMPLAINT: October 14, 2009

DATE OF FILING
THIRD AMENDED

COMPLAINT: August 18, 2010

TRIAL DATE: July 25, 2011

HEARING DATE: June 1, 2011

HEARING TIME: 8:45 a.m.

HEARING PLACE: Dept. 14

11/91/99

EX.1

IX

22 Days 176 Hours

State/Foundation Hours Worked

Monthly Time Sheet

Staff Member : Jeff Rudolph

Month: September 2009

						Total Hours For Month		261.50			
						Total State Hours		202.50			
						Total Foundation Hours		59.00			
DAY	TIME IN	TIME OUT	TOTAL HOURS	STATE HOURS	FOUNDATION HOURS	DAY	TIME IN	TIME OUT	TOTAL HOURS	STATE HOURS	FOUNDATION HOURS
			0.00	0.00		16	7.5	17	9.50	8.50	1.00
			0.00	0.00		17	10	21	11.00	9.00	2.00
1	FH	Foundation 1-19	26.00	8.00	18	18	8	17.5	9.50	8.50	1
2	4	18	14.00	11.00	3	19			0.00	0.00	
3	8	18.5	10.50	9.50	1	20			0.00	0.00	
4	7	19.5	12.50	9.50	3	21	7.5	18	10.50	9.50	1
5			0.00	0.00		22	7	17	10.00	9.00	1
6	11	14	3.00	2.00	1	23	7.5	19	11.50	9.50	2
7-H			8.00	8.00		24	8	18.5	10.50	8.50	2
8	8	15.5	7.50	6.50	1	25	7	19	12.00	9.00	3
9	8	20	12.00	9.00	3	26	9	12	3.00	2.00	1
10	7.5	18.5	11.00	9.00	2	27			0.00	0.00	
11	7.5	14.5	7.00	6.00	1	28	7.5	17.5	10.00	8.00	2
12			0.00	0.00		29	6.5	19	12.50	10.50	2
13	7	17	10.00	7.00	3	30	7	18	11.00	9.00	2
14	12	21	9.00	8.00	1				0.00	0.00	
15	8 to 15	18 to 21	10.00	8.00	2.00				0.00	0.00	
Sub-Totals			140.50	101.50	39.00	Sub-Totals			121.00	101.00	20.00

Sept 7 - Labor Day

11/91/08

1

EX2

State/Foundation Hours Worked

22 Days 176 Hours

Monthly Time Sheet

Staff Member : Jeff Rudolph

Month: October 2009

											Total Hours For Month		
											Total State Hours		256.00
											Total Foundation Hours		
											Total Foundation Hours		54.00
DAY	TIME IN	TIME OUT	TOTAL HOURS	STATE HOURS	FOUNDATION HOURS	DAY	TIME IN	TIME OUT	TOTAL HOURS	STATE HOURS	FOUNDATION HOURS		
			0.00	0.00		16	7	16	9.00	8.00	1.00		
			0.00	0.00		17			0.00	0.00			
1	6.5	16.5	10.00	10.00		18			0.00	0.00			
2	FH		8.00	8.00		19	7.5	22	14.50	10.50	4		
3			0.00	0.00		20	8	19	11.00	9.00	2		
4			0.00	0.00		21	8	19	11.00	8.00	3		
5	7.5	21	13.50	10.50	3	22	8	18	10.00	8.00	2		
6	8	18.5	10.50	8.50	2	23	8	17.5	9.50	7.50	2		
7	7	18.5	11.50	8.50	3	24			0.00	0.00			
8	7.5	21.5	14.00	10.00	4	25			0.00	0.00			
9	7	18	11.00	9.00	2	26	8	17	9.00	8.00	1		
10			0.00	0.00		27	8	17.5	9.50	8.50	1		
11			0.00	0.00		28	7.5	20.5	13.00	9.00	4		
12	8	18.5	10.50	7.50	3	29	6	19	13.00	10.00	3		
13	7	21	14.00	10.00	4	30	6	22	16.00	13.00	3		
14	5	18	13.00	9.00	4	31	7.5	22	14.50	11.50	3		
15				0.00					0.00	0.00			
Sub-Totals			116.00	91.00	25.00	Sub-Totals			140.00	111.00	29.00		

EX.2