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Goodwin Procter LLP  
Three Embarcadero Center, 24<sup>th</sup> Floor  
San Francisco, CA 94111

David Booth Beers (Bar No. 30799)  
Heather H. Anderson  
GOODWIN PROCTER LLP  
901 New York Ave, N.W.  
Washington, D.C. 20001  
Tel: (202) 346-4000  
Fax: (202) 346-4444

Robert B. Bader (Bar No. 233165)  
Elizabeth F. Stone (Bar No. 239285)  
GOODWIN PROCTER LLP  
Three Embarcadero Center  
24<sup>th</sup> Floor  
San Francisco, CA 94111  
Tel: 415-733-6000  
Fax: 415-677-9041

Sherri C. Strand  
Timothy F. Noelker  
Rebecca A. Pinto  
THOMPSON COBURN LLP  
One US Bank Plaza  
St. Louis, MO 63108  
Tel: 314-552-6000  
Fax: 314-552-7000

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

**FILED**  
ALAMEDA COUNTY

**MAR 13 2008**

CLERK OF THE SUPERIOR COURT

By *Kamal Chikson* Deputy

RON LEE, NAOMI GATZKE, JOSEPH THOMPSON, JR., MIRIAM THOMPSON, OUR REDEEMER LUTHERAN CHURCH, a not-for-profit religious corporation, and THE CALIFORNIA-NEVADA-HAWAII DISTRICT OF THE LUTHERAN CHURCH-MISSOURI SYNOD, a not-for profit religious corporation,

Plaintiffs,

vs.

SHARON BOWLES, MARY ANN HILL, PORTIA RIDGEWAY, and CELIA MOYER,

Defendants.

Case No. RG07363452

Judge: Hon. Steven A. Brick  
Hearing Date: March 20, 2008  
Hearing Time: 3:00 p.m.  
Reservation No.: R-795577  
Courtroom No.: 17

**BY FAX**

**AMENDED DECLARATION OF  
HEATHER H. ANDERSON IN SUPPORT  
OF APPLICATION TO APPEAR AS  
COUNSEL PRO HAC VICE**

Filing Date: December 28, 2007  
Trial Date: None Set

1 I, Heather H. Anderson, declare:  
2

3 1. My name is Heather H. Anderson. I have personal knowledge of the facts as set  
4 forth herein and if called as a witness could and would testify competently as to those facts.

5 2. I currently reside at 5934 N. 16<sup>th</sup> Street, Arlington, Virginia. I am a member of  
6 the law firm of Goodwin Procter LLP, and am regularly employed in the District of Columbia, at  
7 901 New York Avenue, N.W., Washington, D.C. 20001. I am not regularly engaged in any  
8 business, professional, or other activities in the State of California. Other than the specific  
9 matters identified in paragraph 6 below, I have not engaged in any business, professional, or  
10 other activities in the State of California in the past two years.

11 3. I have been admitted to practice before the courts of the Commonwealth of  
12 Virginia (date of admission: 1995) and the District of Columbia (date of admission: 1997). I  
13 have also been admitted to the following federal courts: the United States Supreme Court (date  
14 of admission: 1999); the United States District Court for the District of Columbia (2004); the  
15 U.S. Court of Appeals for the Fourth Circuit (date of admission: 1998); and the United States  
16 District Court for the Eastern District of Virginia (date of admission: 1998).

17 4. I am a member in good standing of each of the bars of these courts.

18 5. I am not currently suspended or disbarred in any court.

19 6. I have applied to appear *pro hac vice* in the following California actions in the  
20 preceding two years: (1) *Huber, et al. v. Jackson, et al.* Case No. D035601, Court of Appeal,  
21 Fourth Appellate District, Division One. I filed the application on March 11, 2008, and it is  
22 currently pending. (2) *The Episcopal Church Cases*, Case No. 5155094, Supreme Court of  
23 California. I filed the application on December 5, 2007, and it was granted. (3) *Huber, et al. v.*  
24 *Jackson, et al.*, Case No. BC351287, Superior Court, County of Los Angeles. I filed the  
25 Application on August 17, 2006, and it was granted. (4) *The Episcopal Church v. Poch and*  
26 *The Episcopal Church v. Thompson*, Appellate Case No. G037084; Court of Appeal, Fourth  
27 Appellate District, Division Three. I filed the application on May 31, 2006, and it was granted;  
28 (5) *The Episcopal Church v. Bunyan, et al.*, Appellate Case No. G036868; Court of Appeal,

1 Fourth Appellate District, Division Three. I filed the application on April 19, 2006, and it was  
2 granted.

3 7. The following active members of the State Bar of California are attorneys of  
4 record for the plaintiffs in these cases:

5 David Booth Beers (Bar No. 043596)  
6 Goodwin Procter LLP  
7 901 New York Avenue, N.W.  
8 Washington, D.C. 20001  
9 Tel: (202) 346-4000  
10 Fax: (202) 346-4444

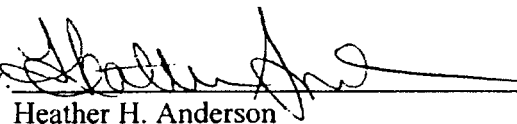
11 Robert B. Bader (Bar No. 233165)  
12 Elizabeth F. Stone (Bar No. 239285)  
13 Goodwin Procter LLP  
14 Three Embarcadero Center, 24<sup>th</sup> Floor  
15 San Francisco, CA 94111  
16 Tel: 415-733-6000  
17 Fax: 415-677-9041

18 8. For the past several years, I and my firm have been representing church entities  
19 in California and other states in connection with property-related litigation.

20 9. Plaintiffs have requested that I appear in this matter on their behalf. I am  
21 familiar with the issues in this case and am prepared to proceed with the litigation of this matter.

22 I declare under penalty and perjury of the laws of California that the foregoing is true  
23 and correct.

24 Executed on this <sup>24<sup>th</sup></sup> day of March, 2008, at Washington, D.C.

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By:   
Heather H. Anderson

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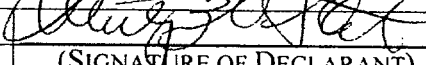
PROOF OF SERVICE	
1.	At the time of service I was at least 18 years of age and <b>not a party to this legal action.</b>
2.	My business address is 3 Embarcadero Center, 24 <sup>th</sup> Floor, San Francisco, CA 94111.
3.	<b>I Served Copies Of The Following Documents:</b>  <b>AMENDED DECLARATION OF HEATHER ANDERSON IN SUPPORT OF APPLICATION TO APPEAR AS COUNSEL PRO HAC VICE</b>
4.	I served the documents listed above in item 3 on the following persons at the addresses listed:
	(SEE ATTACHED SERVICE LIST)
5. a.	<input type="checkbox"/> <b>By personal service.</b> I personally delivered the documents on the date shown below to the persons at the addresses listed above in item 4. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package clearly labeled to identify the attorney being served with a receptionist or an individual in charge of the office. (2) For a party delivery was made to the party or by leaving the documents at the party's residence between the hours of eight in the morning and six in the evening with some person not less than 18 years of age.
b.	<input checked="" type="checkbox"/> <b>By United States mail.</b> I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses in item 4 and <i>(specify one)</i> :
	(1) <input type="checkbox"/> deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid on the date shown below, or
	(2) <input checked="" type="checkbox"/> placed the envelope for collection and mailing on the date shown below, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
	I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Francisco, California.

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c. <input type="checkbox"/>	<b>By overnight delivery.</b> I enclosed the documents on the date shown below in an envelope or package provided by an overnight delivery carrier and addressed to the person at the addresses in item 4. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
d. <input type="checkbox"/>	<b>By messenger service.</b> I served the documents on the date shown below by placing them in an envelope or package addressed to the person on the addresses listed in item 4 and providing them to a professional messenger service for service.
e. <input type="checkbox"/>	<b>By fax transmission.</b> Based on an agreement of the parties to accept service by fax transmission, I faxed the documents on the date shown below to the fax numbers of the persons listed in item 4. No error was reported by the fax machine that I used. A copy of the fax transmission, which I printed out, is attached.
f. <input type="checkbox"/>	<b>By e-mail or electronic transmission.</b> Based on an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent on the date shown below to the e-mail addresses of the persons listed in item 4. I did not receive within a reasonable time after the transmission any electronic message or other indication that the transmission was unsuccessful.

6. I served the documents by the means described in item 5 on:  
March 13, 2008

I declare under penalty of perjury that this document is signed in San Francisco, California under the laws of the State of California that the foregoing is true and correct.

3/13/08	Dorothy W. Stewart	
DATE	(TYPE OR PRINT NAME)	(SIGNATURE OF DECLARANT)

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**SERVICE LIST**

*Ron Lee, et al. v. Sharon Bowles, et al.*  
*Alameda Superior No. RG07-363452*

Audra Thompson, Esq. Duane Morris LLP 633 West Fifth Street Los Angeles, CA 90071-2065 Phone: 213.689.7423 Fax: 213.689.7401 athompson@duanemorris.com  <b>Attorney for Defendants</b>	State Bar of California 180 Howard Street San Francisco, CA 94105
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