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 FILED-Central District
SUPERIOR COURT
SAN BERNARDINO COUNTY

JUL 15 2008

5 Attorneys for Plaintiffs
6 BENCHMARK YOUNG ADULT SCHOOL, INC.
7 AND JAYNE LONGNECKER


Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT

11 BENCHMARK YOUNG ADULT SCHOOL,)
12 INC., a California corporation; and JAYNE)
13 LONGNECKER, an individual,)
14 Plaintiff,)

CASE NO.: CIVSS 803920

DECLARATION OF GREG BURKS IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO
SPECIAL MOTION TO STRIKE COMPLAINT
PURSUANT TO CCP §425.16

15 v.
16 MICHAEL CRAWFORD, an individual; and)
17 DOES 1 through 50, inclusive,)
18 Defendant.)
19)
20)

21 I, Greg Burks, declare as follows:

- 22 1. I am an employee of Defendant, Benchmark Young Adult School ("BENCHMARK").
23 I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint
24 Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and
25 would testify to, the following facts:
26 2. I have been employed by BENCHMARK for four and ½ years. I am a Primary Counselor.
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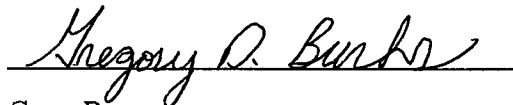
1 3. On or about Wednesday, November 21, 2007, I was working at the BENCHMARK
2 Educational Center. I was aware that a former student named Michael Crawford had appeared at
3 BENCHMARK and was seeking to persuade BENCHMARK students to leave the school. I saw him
4 holding up signs, attempting to persuade students to leave the program. Another staff member pointed
5 out CRAWFORD to me and explained who he was.

6 4. At this time, I saw CRAWFORD trespass onto BENCHMARK property. CRAWFORD
7 appeared to be taping with his videocamera. I saw CRAWFORD walk into the area where
8 BENCHMARK staff park their vehicles. While on BENCHMARK property CRAWFORD appeared
9 to videotape the vehicles' make/model and license plate information.

10 5. I reported this information to the Dean, Joelle Walters.

11
12 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
13 correct.

14 Executed on July 14, 2008 in REDLANDS, CALIFORNIA

15
16 
17 GREG BURKS