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9 BENCHMARK YOUNG ADULT SCHOOL, INC.
10 AND JAYNE LONGNECKER

FILED-Central District
SUPERIOR COURT
SAN BERNARDINO COUNTY

JUL 15 2008

By *Stephanie Chandler*
Deputy

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

BENCHMARK YOUNG ADULT SCHOOL,
INC., a California corporation; and JAYNE
LONGNECKER, an individual,

Plaintiff,

v.

MICHAEL CRAWFORD, an individual; and
DOES 1 through 50, inclusive,

Defendant.

CASE NO.: CIVSS 803920

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

I, Linda Lucas, declare as follows:

1. I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and would testify to, the following facts:
2. I have been a licensed Marriage and Family Therapist (#MFC 27335) since 1990.
3. I received a Bachelor of Arts degree in Psychology in 1980 and a Masters of Science in Counseling/Marriage and Family Therapy in 1987.
4. I became a licensed Marriage and Family Therapist (#MFC 27335) in 1990 after

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT
10

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

13)
14) Plaintiff,

15) v.

16)
17) MICHAEL CRAWFORD, an individual; and
DOES 1 through 50, inclusive,)

18)
19) Defendant.
20)

CASE NO.: CIVSS 803920

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

21 I, Linda Lucas, declare as follows:

22 1. I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike
23 Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify
24 could and would testify to, the following facts:

25 2. I have been a licensed Marriage and Family Therapist (#MFC 27335) since 1990.

26 3. I received a Bachelor of Arts degree in Psychology in 1980 and a Masters of Science in
27 Counseling/Marriage and Family Therapy in 1987.

28 4. I became a licensed Marriage and Family Therapist (#MFC 27335) in 1990 after

1 completing the requisite training and a 2500 hour Internship. In order to renew my license I participate
2 in 36 continuing education units every 2 years.

3 5. I have worked with adolescents and young adults in residential settings since 1983.

4 6. I have been providing psychological services to students of Benchmark Young Adult School
5 ("BENCHMARK") since June of 2003. The services I provide to BENCHMARK students include
6 Individual Psychotherapy (weekly), Family Therapy (as requested), Couples Therapy (as requested),
7 and Clinical Consultation (as requested).

8 7. Students are referred for therapy following a request for therapy initiated by a variety of
9 sources, including either the student, the student's parent(s), BENCHMARK staff, BENCHMARK
10 administration, Dr. Maurer or Dr. Nelson. When a request is initiated, BENCHMARK makes every
11 possible effort to arrange psychological services for the student after a determination is reached as to
12 the most suitable treatment milieu for that student. It is not uncommon for a student to be receiving
13 psychological services from more than just one of the resources mentioned (e.g., Individual
14 psychotherapy with me, plus an eating disorder or substance abuse group in the community).

15 8. In the five (5) years I have been working with BENCHMARK students, I have consistently
16 witnessed BENCHMARK seeking psychological services for their students from not only myself, Dr.
17 Maurer and Dr. Nelson, but also from community resources (e.g. Loma Linda Behavioral Medicine
18 Center, Redlands/Yucaipa Guidance Clinic, Alternative Group).

19 9. I have never known of BENCHMARK to deny a request for therapy. I am also aware that
20 BENCHMARK has on occasion itself paid for therapy for students who could benefit from such a
21 service, but whose parents were either unable, or unwilling, to pay for the service. Not all
22 BENCHMARK students request, or need, therapy. To my knowledge, no student is ever forced to have
23 therapy, and no student is ever denied therapy if requested.

24 10. My experience with Benchmark is unique in that students do not meet with me at my private
25 practice office. Instead, I meet with the students on-site at BENCHMARK either at the Education
26 Center or at the residential complex. This is in my view important to mention in that it illustrates to
27 students that therapy is readily available in comfortable, familiar surroundings. Notably, this
28 arrangement also gives me an opportunity to observe the BENCHMARK program at work on a weekly

1 basis. My observations not only facilitate a student's progress in therapy, they afford me with possibly
2 a more objective view of the BENCHMARK program.

3 11. For five years, I have witnessed BENCHMARK'S program at work as students and their
4 families who have previously struggled for years find happiness and good emotional, mental and
5 physical health. I have witnessed success after success as students complete the program and enter the
6 adult world as confident, healthy and productive individuals.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
8 and correct.

9 Executed on July 11, 2008 in Redlands, CA

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Linda S. Lucas, MFT
LINDA LUCAS, MFT