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Cooley FILED-Central District
SUPERIOR COURT
SAN BERNARDINO COUNTY
JUL 15 2008
By *Stephanie Chandler*
Deputy

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

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT

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

13 Plaintiff,)

14 v.)

15)
16 MICHAEL CRAWFORD, an individual; and)
17 DOES 1 through 50, inclusive,)

18 Defendant.)
19

CASE NO.: CIVSS 803920
DECLARATION OF WILLIAM NELSON IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO
SPECIAL MOTION TO STRIKE COMPLAINT
PURSUANT TO CCP §425.16

20 I, William Nelson, declare as follows:

- 21 1. I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike
22 Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify
23 could and would testify to, the following facts:
24 2. I am a licensed Psychologist in the state of California and have been so continuously since
25 1982.
26 3. I was educated at Brown University, the University of Kansas and the University of
27 California, Riverside, where I received my doctorate in December 1978.
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26 1982.

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28 California, Riverside, where I received my doctorate in December 1978.

1 4. I began working with children and adolescents in high school as a volunteer for Head Start.
2 My first job with residential programs began in 1976 when I worked as a therapist for Riverside County
3 Residential Treatment Services.

4 5. I did my Internship at Loma Linda University Medical Center Dept. of Psychiatry and post
5 graduate work at The Village of Childhelp (then called Children's Village, a large residential program
6 for abused children), where I began as a therapist and eventually served as the Clinical Director after
7 three years.

8 6. I have served as Clinical Director and Psychologist for several other residential programs
9 for disabled children and adults. I began private practice in Redlands in 1982 and have been so
10 continuously till the present.

11 7. I have focused my continuing education requirements on addictive behaviors, adolescent
12 and young adult therapy and newer innovative treatments. My current specialties include cognitive
13 behavioral therapy, evidence based therapeutics, Dialectic Behavior Therapy, suicide prevention and
14 Acceptance and Commitment Therapy.

15 8. I am one of several independently licensed mental health professionals to whom
16 Benchmark Young Adult School ("BENCHMARK") refers its students. I began working with
17 BENCHMARK students approximately 12 years ago when a psychiatrist with whom I worked on
18 numerous cases at Loma Linda Behavioral Medicine Center recommended me to Jaynie Longnecker
19 ("Mrs. Longnecker"), then Director of BENCHMARK.

20 9. In my capacity as an independently licensed mental health professional, I am able to offer
21 confidential and professional counseling services to BENCHMARK students as an adjunct to the
22 BENCHMARK residential program. I receive information weekly about the students I see and give
23 feedback when I can according to the limitations of confidentiality. I work closely with the
24 BENCHMARK staff regarding referrals, insurance information, scheduling, medication issues and the
25 on-going issues of their, and my, clients.

26 10. I also communicate directly with the parents of my BENCHMARK clients when that need
27 arises and have in the past met with a number of these families. I perform psychological and educational
28 testing when that is appropriate and necessary. I also consult with the student's treating Psychiatrist to

1 offer interdisciplinary cooperation as needed.

2 11. As noted above, I have worked with a number of inpatient and residential programs that
3 treat young adults. I know of none that provide the variety and intensity of therapeutic options that
4 BENCHMARK does. From my own personal interaction with the BENCHMARK staff, I have found
5 them to be well grounded in addictive behavioral intervention and treatments.

6 12. In addition, the BENCHMARK program itself has a good variety of therapeutic strategies.
7 While many programs seem to be wary of psychological, psychiatric and other outside disciplines, I
8 have always found BENCHMARK and particularly Mrs. Longnecker and Joelle Walters, the current
9 Dean, to welcome outside opinions and consultation.

10 13. I have seen great progress with the majority of the clients I have seen from BENCHMARK
11 and have recommended the program to others. I would not have continued my association with them
12 had it been otherwise.

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

15 Executed on July 11, 2008 in Redlands, CA.

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18 WILLIAM NELSON, Ph.D.

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