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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF LOS ANGELES

13 CLEVE PELL,

14 Plaintiff,

15 v.

16 THE MONTEBELLO UNIFIED SCHOOL
17 DISTRICT, a local public education
18 agency; and THE MONTEBELLO
19 UNIFIED SCHOOL DISTRICT BOARD
20 OF EDUCATION, the governing body of a
21 local public educational agency; and DOES
22 1 through 10 inclusive,

23 Defendants.

Case No. BC679686

[Hon. Michael Paul Linfield, Dept. 34]

**DECLARATION OF CHARLES E.
PELL IN SUPPORT OF PLAINTIFF
CLEVE PELL'S EX PARTE
APPLICATION**

*[Plaintiffs' Notice of Ex Parte Application
and Ex Parte Application; Declarations of
J. Anthony King and Charles E. Pell in
support thereof; and [Proposed] Order
filed concurrently herewith]*

Date: March 1, 2019
Time: 8:30 a.m.
Dept.: 34

Complaint filed: October 16, 2017
Trial Date: February 27, 2019

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DECLARATION OF CHARLES E. PELL

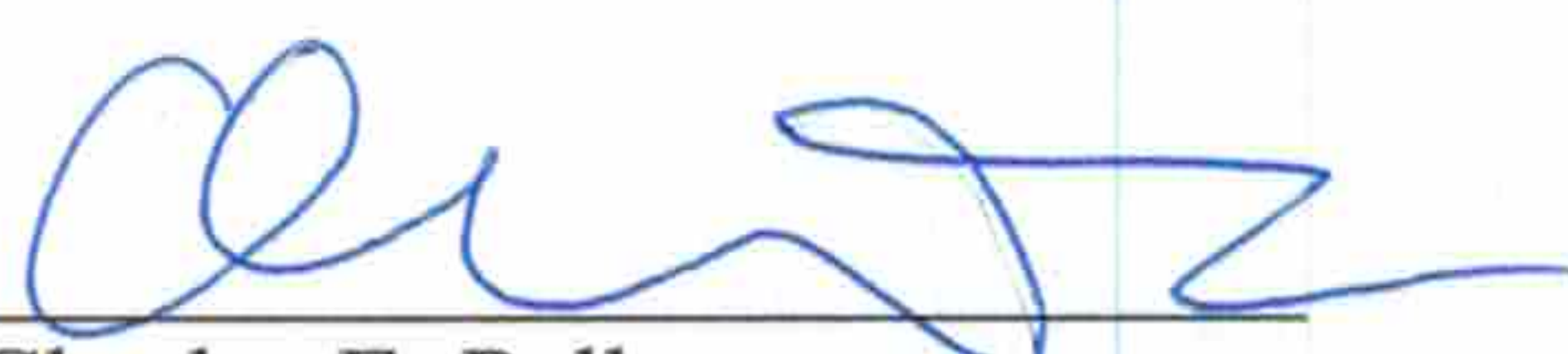
I, Charles E. Pell, state and declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and currently serve as an Assistant United States Attorney for the Central District of California. After graduating USC law school in 2000, I clerked for one year for a U.S. district court Judge, followed by one year for a circuit Judge on the U.S. Court of Appeals for the Ninth Circuit. In 2015, I received the CLAY award in criminal practice. I submit this declaration in support of Plaintiff's *Ex Parte* Application to Request an Evidentiary Hearing. Except as otherwise stated, I have personal and firsthand knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to these facts under oath. I make this declaration in my personal capacity, and not in my official capacity as a federal prosecutor.

2. On or about February 13, 2019, I met with Dr. Mark Skvarna in Brea, California, at approximately 7:30 am. During this meeting, I provided Dr. Skvarna with a copy of a declaration in his name dated January 18, 2019, which had been filed on January 23, 2019, in Los Angeles Superior Court case number BC679686. After reviewing that declaration during our meeting, Dr. Skvarna told me that this was the first time that he had seen this document, confirmed that the signature on it was not his signature, and said that he had never authorized anyone to sign it on his behalf. Dr. Skvarna also told me that some content contained within the declaration was not accurate and did not originate from him.

I declare under penalty of perjury under the laws of the State of California that the foregoing facts are true and correct.

Executed this 27 day of February 2019, at MONTEBELLO, California.


Charles E. Pell