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FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

OCT 11 2011

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Attorneys for Defendant DANIEL R. JACKSON

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF RIVERSIDE

10 JEFFRY M. KAATZ, JAMES W.  
11 BEACH, and GARY L. BRADLEY,

12 Plaintiff,

13 v.

14 RICARDO GRAHAM; PACIFIC UNION  
15 CONFERENCE OF SEVENTH-DAY  
16 ADVENTISTS, a not-for-profit  
17 corporation; DANIEL R. JACKSON;  
18 LARRY BLACKMER; NORTH  
19 AMERICAN DIVISION CORPORATION  
20 FO SEVENTH-DAY ADVENTISTS, a  
not-for-profit corporation; and LA  
SIERRA UNIVERSITY, a not-for profit  
corporation; and DOES 1-100,

21 Defendants.

Case No.: RIC 1112557

DECLARATION OF DANIEL R.  
JACKSON IN SUPPORT OF MOTION  
TO QUASH COMPLAINT FOR LACK  
OF JURISDICTION

Date: 11-8-11  
Time: 8:30  
Dept: 2

FILED BY FAX  
CRC 2005

22 I, DANIEL R. JACKSON, declare:

23 1. I am the President of the North American Division of Seventh-day  
24 Adventists, which is located in Silver Spring, Maryland.

25 2. All the facts set forth in these moving papers are true and correct upon  
26 information and belief.  
27  
28

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8 Attorneys for Defendant DANIEL R. JACKSON

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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

JEFFRY M. KAATZ, JAMES W.  
BEACH, and GARY L. BRADLEY,

Plaintiff,

v.

RICARDO GRAHAM; PACIFIC UNION  
CONFERENCE OF SEVENTH-DAY  
ADVENTISTS, a not-for-profit  
corporation; DANIEL R. JACKSON;  
LARRY BLACKMER; NORTH  
AMERICAN DIVISION CORPORATION  
FO SEVENTH-DAY ADVENTISTS, a  
not-for-profit corporation; and LA  
SIERRA UNIVERSITY, a not-for profit  
corporation; and DOES 1-100,

Defendants.

Case No.: RIC 1112557

**DECLARATION OF DANIEL R.  
JACKSON IN SUPPORT OF MOTION  
TO QUASH COMPLAINT FOR LACK  
OF JURISDICTION**

Date:  
Time:  
Dept:

I, DANIEL R. JACKSON, declare:

1. I am the President of the North American Division of Seventh-day Adventists, which is located in Silver Spring, Maryland.

2. All the facts set forth in these moving papers are true and correct upon information and belief.

1           3.       On April 20, 2011, I attended a special meeting of the faculty at La Sierra  
2 University ("LSU") in Riverside, California, to discuss a decision of the Adventist  
3 Accrediting Association ("AAA") to limit the accreditation of LSU to two years subject to  
4 the university showing signs of progress in addressing certain concerns of the AAA.  
5 After this meeting, the plaintiffs met in one of their homes to watch a basketball game.  
6 During this meeting, plaintiffs consumed alcohol and made numerous disparaging  
7 remarks regarding the Church, church leaders, the AAA, and others. Lenny Darnell, an  
8 LSU Board member, participated in this meeting and made an audio recording of the  
9 meeting with his telephone. This recording eventually found its way to me after it had  
10 been given to various LSU personnel by Mr. Darnell, and after it had been posted on a  
11 public website. I did not request the recording nor did I have anything to do with the  
12 making of it and only found out about it after the fact.  
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15           4.       At no time did I ever tell Ricardo Graham what he should do regarding  
16 this matter or give him instructions as how to proceed. The decision of how to handle  
17 the matter was left entirely to Ricardo Graham as it was his choice and responsibility to  
18 deal with the matter as Chairman of the Board for LSU.  
19

20           5.       After he received the recording I was a participant in a phone  
21 conversation on June 9, 2011, with Ricardo Graham regarding this matter prior to his  
22 meetings with the plaintiffs. After that conversation with Ricardo Graham regarding this  
23 matter it is my understanding that Mr. Graham handled the matter with LSU legal  
24 counsel and I had no further involvement in this matter.  
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26           6.       I recognized that the handling of the issue was a matter for LSU and the  
27 Pacific Union Conference, not the North American Division of Seventh-day Adventists.  
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It is not my practice of going over the individual Union's heads and I did not do so in this matter.

7. My contacts with California are minimal as I own no property in California or have any business interests in California. I do hold certain Board positions as a result of my position as President of North American Division of Seventh-day Adventists, however these positions do not concern LSU. All actions related to this lawsuit took place in Maryland, with the exception of the faculty meeting which I attended and which was recorded by Lenny Darnell. However, that faculty meeting, and my actions there, is not a subject of this litigation.

I declare under penalty of perjury, under the laws of the State of Maryland, that the foregoing is true and correct.

Dated: Feb. 10, 2011

By:   
DANIEL R. JACKSON

**PROOF OF SERVICE**  
CCP 1013(a), 1013(c), 2015.5/FRCP 5  
California Rules of Court 2.253, 2.255, 2.260, 2.301(3), 2.306(a)

1 CASE NAME: KAATZ v. GRAHAM, et al.  
2 COURT NAME: RIVERSIDE COUNTY SUPERIOR COURT  
3 CASE NO: RIC 1112557

4 I am a resident of, or employed in the County of Sacramento, State of California. I am over the age of eighteen years  
5 and not a party to this action. My business address is: 1420 River Park Drive, 2<sup>nd</sup> Floor, Sacramento, CA 95815.

6 On the date below, I served the following listed documents by the method indicated below, on the parties in this action:

7 **DECLARATION OF DANIEL R. JACKSON IN SUPPORT OF MOTION TO QUASH COMPLAINT FOR LACK OF JURISDICTION**

- 8  BY U.S. MAIL: By placing  the original/  a true copy thereof enclosed in a sealed envelope(s), with postage fully  
9 prepaid, addresses as per the attached service list, for collection and mailing at Hiroshima, Jacobs, Roth & Lewis in  
10 Sacramento, California following ordinary business practices. I am readily familiar with the firm's practice for collection  
11 and processing of correspondence for mailing. Under that practice, the correspondence is deposited with the U.S. Postal  
12 Service on the same day in the ordinary course of business. See CCP 1013(a).
- 13  BY OVERNIGHT DELIVERY: By delivering the document(s) listed above in a sealed envelope(s) or package(s)  
14 designated by the express service carrier, with delivery fees paid or provided for, addresses as per the attached service  
15 list, to a facility regularly maintained by the express service carrier or to an authorized courier or driver authorized by the  
16 express service to receive documents. Sent Via FEDERAL EXPRESS. See CCP 1013(c).
- 17  BY PERSONAL DELIVERY:
- 18  By personally delivering the document(s) listed above to the parties listed on the service list. See CCP 1011.  
19  By personally delivering the documents(s) listed above to the offices at the address(es) shown on the service list.  
20 See CCP 1011(a).  
21  By placing the document(s) listed above in a sealed envelope(s) and instructing a registered process server to  
22 personally deliver the envelope(s) to the offices at the address(es) set forth on the attached service list. The signed proof  
23 of service by the registered process server is attached.
- 24  BY ELECTRONIC SERVICE: (via electronic filing service provider) By electronically transmitting the document(s) listed  
25 above to a LexisNexis File and Serve, an electronic service provider, at [www.fileandserve.lexisnexis.com](http://www.fileandserve.lexisnexis.com) pursuant to  
26 the Court's Order mandating electronic Service. The transmission was reported as complete and without error. See  
27 California Rules of Court 2.253, 2.255, 2.260.
- 28  BY ELECTRONIC SERVICE: (to individual persons) By electronically transmitting the document(s) listed above to the  
email address(es) of the person(s) set forth on the attached service list. The transmission was reported as complete  
without error. See Rules of Court 2.260.
- BY FACSIMILE: By transmitting the document(s) listed above from HIROSHIMA, JACOBS, ROTH & LEWIS in  
Sacramento, California to the facsimile machine telephone number(s) set forth on the attached service list. The  
telephone number I used was (916) 929-7335. The facsimile machine complies with Rule 2.301(3) of the California  
Rules of Court. Service by facsimile transmission was made pursuant to the agreement of the parties, confirmed in  
writing. Pursuant to California Rules of Court, Rule 2.306(a), I caused the machine to print a transmission record of the  
transmission, a copy of which is attached to this Declaration.
- STATE I declare under the penalty of perjury under the laws of the State of California that he above is true and  
correct.
- FEDERAL I declare under the penalty of perjury under the laws of the United States that I am employed in the office of  
a member of the bar of this court whose direction the service is made.

Executed on October 11, 2011 at Sacramento, California.

\_\_\_\_\_  
CHRISTINA WILL

/s/

\_\_\_\_\_  
(Signature)

**PROOF OF SERVICE**  
CCP 1013(a), 1013(c), 2015.5/FRCP 5  
California Rules of Court 2.253, 2.255, 2.260, 2.301(3), 2.306(a)

**SERVICE LIST**

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Michael W. Connally, Esq. Madonna L. Devling, Esq. Sean Paisan, Esq. LEWIS BRISBOIS BISGAARD & SMITH, LLP 650 Town Center Drive, Suite 1400 Costa Mesa, CA 92626	PH: (714) 545-9200 FX: (714) 850-1030 EM: <a href="mailto:connally@bbslaw.com">connally@bbslaw.com</a> <a href="mailto:devling@bbslaw.com">devling@bbslaw.com</a> <a href="mailto:spaisan@bbslaw.com">spaisan@bbslaw.com</a>	<i>Counsel for DEFENDANTS</i>  LA SIERRA UNIVERSITY, PACIFIC UNION CONFERENCE OF SEVENTH-DAY ADVENTISTS and NORTH AMERICAN DIVISION CORPORATION OF SEVENTH- DAY ADVENTISTS

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