

COPY

GRIFFITH & THORNBURGH, LLP

ATTORNEYS AND COUNSELORS
8 EAST FIGUEROA STREET, SUITE 300
POST OFFICE BOX 9
SANTA BARBARA, CA 93102-0009
TELEPHONE: 805-965-5131
TELECOPIER: 805-965-6751

John R. Rydell II, #62606
John C. Eck, #194975

ATTORNEYS FOR: Defendant and Cross-Complainant RANDY CAMPBELL

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
ANACAPA DIVISION**

MARIANNE PARTRIDGE,
Plaintiff,

v.

RANDY CAMPBELL, and DOES 1 through
40, inclusive,
Defendants.

CASE NO.: 1341942

**DECLARATION OF RANDY
CAMPBELL IN SUPPORT OF
REPLY TO OPPOSITION TO
APPLICATION FOR LEAVE TO FILE
FIRST AMENDED CROSS-
COMPLAINT**

Date: November 4, 2010
Time: 9:30 a.m..
Dept: 6

[Assigned for all purposes to the Honorable
Denise de Bellefeuille]

RANDY CAMPBELL,
Cross-Complainant,

v.

MARIANNE PARTRIDGE, and ROES 1
through 50, inclusive
Cross-Defendant

DECLARATION OF RANDY CAMPBELL

I, Randy Campbell, declare as follows:

1. Since at least 2004, payments of the Santa Barbara Independent, Inc.'s earnings to shareholders have been occurring monthly, without any approval given nor needed from the Board of Directors.

1 Board of Directors.

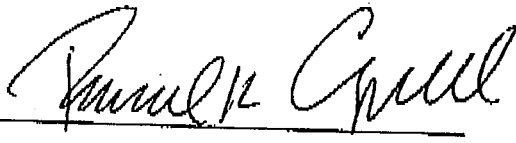
2 2. The amount and timing of payments have been determined, since at least 2004,
3 by the company CFO, balancing the short and long-term cash needs of the company. The final
4 approval has been made by the publisher.

5 3. In 1997, I was advised by corporate counsel that no Board approval was necessary
6 for paying company earnings to shareholders. Nonetheless, I have kept the Board and
7 Shareholders apprised of earnings payments in meetings and in private discussions. Rick Grand-
8 jean, a shareholder and board member, has made it a monthly practice to call either the company
9 CFO or me to ask when the checks were to be delivered.

11 4. Only in 2009 did the payments stop, due to our company's response to a difficult
12 economic climate. Marianne Partridge's attempts to audit and evaluate my contributions to the
13 newspaper are certainly colored by this litigation, are unsupported by facts, and are both insulting
14 and sad.

16 5. I have numerous completed and in process projects, emails, and various work-
17 product data to support my consistent and dedicated stewardship of the Independent, but can
18 most readily point to the improved condition of the company since the low point of mid-2009 as
19 proof enough. That is my ultimate responsibility, and like Marianne Partridge, I am proud of the
20 people who all contribute to the Independent's success.

22 I declare, under penalty of perjury, under the laws of the State of California, that the
23 foregoing is true and correct. Executed this 3rd day of November, 2010, at Santa Barbara,
24 California.

25 
26

26 GRIFFITH & THORNBERG, LP
ATTORNEYS AND COUNSELORS
8 EAST FIGUEROA STREET
POST OFFICE BOX 11
SANTA BARBARA, CA 93102-0011

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA**

3 I am employed by the law firm of GRIFFITH & THORNBURGH, LLP in the County of
4 Santa Barbara, State of California. I am over the age of 18 and not a party to the within action.
My business address is 8 East Figueroa St., #300, Santa Barbara, California 93101.

5 On November 3, 2010, I served the foregoing document described as **DECLARATION**
6 **OF RANDY CAMPBELL IN SUPPORT TO REPLY TO OPPOSITION TO**
7 **APPLICATION FOR LEAVE TO FILE FIRST AMENDED CROSS-COMPLAINT**
on the parties and/or interested persons in this action by placing the original a true copy
thereof in sealed envelopes, addressed as indicated on the attached list, or as otherwise indicated
below.

8 **BY MAIL**

9 I deposited such envelopes in this firm's mailing system. I am readily familiar with
10 my employer's practice for collection and processing of correspondence for mailing with the U.S.
Postal Service. Under that practice, correspondence or documents served as above indicated
11 would be deposited for first class delivery, postage fully prepaid, with the U.S. Postal Service on
that same day in the ordinary course of business.

12 I deposited such envelopes in the mail at Santa Barbara, California. The envelopes
were mailed with postage thereon fully prepaid.

13 **HILL & TRAGER, LLP,**
14 **Attorneys at Law**
15 **Gary J. Hill**
16 **800 Presidio Avenue,**
Santa Barbara, California 93101

17 **BY PERSONAL SERVICE**

I delivered such envelopes by hand to the offices of the addressee(s).

18 **BY OVERNIGHT DELIVERY SERVICE**

I deposited true copies of the foregoing document in:

19 the United States mail at Santa Barbara, California, for Express Mail delivery, in a
sealed envelope, addressed as indicated on the attached mailing list, with Express Mail postage
20 thereon fully prepaid.

21 a box or other facility in Santa Barbara, California, regularly maintained by FEDEX-
KINKOS in an envelope or package designated by FEDEX-KINKOS, addressed as indicated on
22 the attached mailing list, with delivery fees paid or provided for.

23 I declare under penalty of perjury under the laws of the State of California that the above is
24 true and correct and that this declaration was executed on November 3, 2010, at Santa Barbara,
California.

25 
26 Rashel Robledo