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8 (415) 984-8700

9 Attorneys for Defendants Margaret Thaler
10 Singer and Janja Lalich

ENDORSED
FILED
San Francisco County Superior Court

APR 15 1996

ALAN CARLSON, Clerk
BY: S. DOUGLAS
Deputy Clerk

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN FRANCISCO

13 LANDMARK EDUCATION
14 CORPORATION, a corporation,

15 Plaintiff,

16 vs.

17 MARGARET THALER SINGER, an
18 individual, JANJA LALICH, an individual,
19 and DOES 1 through 100, inclusive,

20 Defendants.

Case No. 976037

DECLARATION OF NEIL S. JAHSS IN
SUPPORT OF DEFENDANTS'
SPECIAL MOTION TO STRIKE
COMPLAINT
[C.C.P. § 425.16]

Date: May 1, 1996
Time: 9:30 a.m.
Place: Dept. 10,
Room 414
Trial Date: None

1 I, Neil S. Jahss, state and declare:

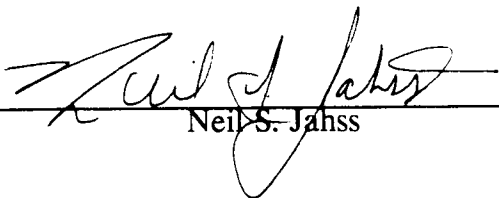
2
3 1. I am a member in good standing of the State Bar of California and
4 admitted to practice before this Court. I am an attorney at O'Melveny & Myers, counsel of
5 record for defendants Margaret Thaler Singer and Janja Lalich in a defamation action
6 brought by Landmark Education Corporation. I have personal knowledge of the matters
7 set forth in this declaration and could competently testify thereto if called as a witness.
8

9 2. Attached hereto as Exhibit A is a true and correct copy of a transcript
10 of the "Larry King Live" television program that aired on CNN at 9:00 p.m. ET on
11 December 8, 1993. I personally retrieved this transcript from the Lexis-Nexis computer
12 database. Werner Erhard was the featured guest on this edition of "Larry King Live."
13

14 3. Attached hereto as Exhibit B is a true and correct copy of a transcript
15 of the "Sonya Live" television program that aired on CNN at 1:00 p.m. ET on November 10,
16 1993. I personally retrieved this transcript from the Lexis-Nexis computer database. Beth
17 Hanover, who is represented to be an employee of Landmark Education Corporation, was a
18 featured guest on this edition of "Sonya Live."
19

20 I declare under penalty of perjury under the laws of the State of California
21 that the foregoing is true and correct.
22

23 Executed this 13th day of April, 1996, at Los Angeles, California.
24

25 
26 _____
27 Neil S. Jahss
28