

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
RAPHAEL METZGER, ESQ., SBN 116020
SCOTT P. BRUST, ESQ., SBN 215951
555 E. OCEAN BLVD., SUITE 800
LONG BEACH, CA 90802
TELEPHONE: (562) 437-4499
TELECOPIER: (562) 436-1561
WEBSITE: www.toxicortorts.com

Attorneys for Intervenor-Defendant,
COUNCIL FOR EDUCATION AND
RESEARCH ON TOXICS (“CERT”)

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA CHAMBER OF
COMMERCE,

Plaintiff,

vs.

XAVIER BECERRA, IN HIS OFFICIAL
CAPACITY AS ATTORNEY GENERAL
OF THE STATE OF CALIFORNIA.

Defendant.

Civil No. 2:19-cv-02019-KJM-JDP

*Assigned to the Hon. Kimberly A. Mueller,
Ctrm. 3*

**DECLARATION OF NANCY QUAM-
WICKHAM SUPPORT OF MOTION OF
INTERVENOR-DEFENDANT, COUNCIL
FOR EDUCATION AND RESEARCH ON
TOXICS (“CERT”), TO DISQUALIFY
THE HON. KIMBERLY J. MUELLER**

DATE: September 17, 2021
TIME: 10:00 a.m.
CTRM: 3

**REDACTS MATERIAL FROM SEALED
RECORDS**

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF NANCY QUAM-WICKHAM

I, Nancy Quam-Wickham, declare as follows:

1. I am an adult residing in the State of California.

2. Unless the context indicates otherwise, I have personal knowledge of the matters set forth hereinafter and, if called as a witness, I would competently testify thereto.

3. This declaration is submitted in support of CERT’s motion to disqualify the Honorable Kimberly J. Mueller as the trier of fact and the judge in this case. [ECF 152]

4. I am the Chief Financial Officer for Intervenor-Defendant Council for Education and Research on Toxics (CERT). I have held that position at all times since the filing of this action.

5. I hereby represent that I have authority to make the statements contained herein on behalf of CERT.

Exhibits

6. Attached hereto as Exhibit “A” is a true and correct copy of an article titled “Bob Slobe, prominent North Sacramento businessman and firebrand,” published in *Yahoo! News* on November 11, 2012.

7. Attached hereto as Exhibit “B” is a true and correct copy of an article titled “North Sac project attacked,” published in the *Sacramento Business Journal* on January 18, 2004.

8. Attached hereto as Exhibit “C” is a true and correct copy of an article titled “The phantom of the arts,” published in *Sacramento News & Review* on January 13, 2005.

9. Attached hereto as Exhibit “D” is a true and correct copy of the American River Parkway Preservation Society Board of Directors webpage.

10. Attached hereto as Exhibit “E” is a true and correct copy of Robert Slobe’s Linked-In page.

11. Attached hereto as Exhibit “F” is a true and correct copy of a photograph from the North Sacramento Chamber of Commerce website.

//

//

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 12. Attached hereto as Exhibit "G" is a true and correct copy of the Statement of
2 Information of North Sacramento Chamber of Commerce, filed with the California Secretary of State
3 on April 4, 2019.

4 13. Attached hereto as Exhibit "H" is a true and correct copy of the Statement of
5 Information, North Sacramento Chamber of Commerce, filed with the California Secretary of State
6 on September 27, 2017.

7 14. Attached hereto as Exhibit "I" is a true and correct copy of a webpage of the North
8 Sacramento Chamber of Commerce titled "Advocacy" which contains a section headed "Stronger
9 Together."

10 15. Attached hereto as Exhibit "J" is a true and correct copy of an excerpt from the Local
11 Chambers Lookup webpage of the California Chamber of Commerce which identifies the
12 Sacramento Metro Chamber of Commerce as a member of the California Chamber of Commerce.

13 16. Attached hereto as Exhibit "K" is a true and correct copy of a webpage of the
14 Chamber of Commerce titled "THE CALCHAMBER and LOCAL CHAMBERS: A Profitable
15 Partnership."

16 17. Attached hereto as Exhibit "L" is a true and correct copy of the North Sacramento
17 Land Company Statement of Information filed with the Secretary of State on March 17, 2021.

18 18. Attached hereto as Exhibit "M" is a true and correct copy of a North Sacramento Land
19 Company Statement of Information filed with the Secretary of State on December 12, 2005.

20 19. Attached hereto as Exhibit "N" is a true and correct copy of the North Sacramento
21 Land Company Secretary of State Entity Detail.

22 20. Attached hereto as Exhibit "O" is a true and correct copy of a screenshot of a banner
23 on the North Sacramento Chamber of Commerce website.

24 21. Attached hereto as Exhibit "P" is a true and correct copy of the List of Current
25 Members of the Sacramento Host Committee.

26 22. Attached hereto as Exhibit "Q" is a true and correct copy of the Sacramento Host
27 Committee homepage.

28 //

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

- 1 23. Attached hereto as Exhibit "R" is a true and correct copy of Sacramento Host
- 2 Committee webpage titled "About Us".
- 3 24. Attached hereto as Exhibit "S" is a true and correct copy of the Sacramento Host
- 4 Committee Contact webpage.
- 5 25. Attached hereto as Exhibit "T" is a true and correct copy of CalChamber's webpage
- 6 titled "Ongoing CalChamber Events".
- 7 26. Attached hereto as Exhibit "U" is a true and correct copy of an article titled
- 8 "Sacramento Host Breakfast canceled for first time in 95 years," by Mark Anderson, Staff Writer,
- 9 Sacramento Business Journal, published on April 6, 2020.
- 10 27. Attached hereto as Exhibit "V" is a true and correct copy of a Yelp webpage for the
- 11 North Sacramento Land Company.
- 12 28. Attached hereto as Exhibit "W" is a true and correct copy of the FDA Survey Data
- 13 on Acrylamide in Food: Total Diet Study Results: Acrylamide Values in Individual Food Product
- 14 Samples, Data from 2015, in the form of an Excel spreadsheet regarding Nuts and Fruits.
- 15 29. Attached hereto as Exhibit "X" is a true and correct copy of the Office of
- 16 Environmental Health Hazard Assessment, Proposition 65 No Significant Risk Levels (NSRLs) for
- 17 Carcinogens and Maximum Allowable Dose Levels (MADLs) for Chemicals Causing Reproductive
- 18 Toxicity.
- 19 30. Attached hereto as Exhibit "Y" is a true and correct copy of the California Almonds:
- 20 Almond Board of California, "Acrylamide in Roasted Almonds," Technical Summary, published in
- 21 July 2014.
- 22 31. Attached hereto as Exhibit "Z" is a true and correct copy of a press release by Adam
- 23 Regele, titled "CalChamber Wins landmark Prop 65 Ruling," published on April 6, 2021.
- 24 32. Attached hereto as Exhibit "AA" is a true and correct copy of a spreadsheet of
- 25 Proposition 65 notices of violations regarding almond products.
- 26 33. Attached hereto as Exhibit "BB" is a true and correct copy of a screenshot of a
- 27 FastPeopleSearch for Kimberly Mueller in Sacramento, CA (California), which states that the
- 28 "Current Address" of Kimberly Mueller is 400 Slobe Ave., Sacramento CA 95815.

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 34. Attached hereto as Exhibit "CC" is a true and correct copy of a screenshot of a Public
2 Data USA search which reveals a Ms Kimberly Jo Mueller, age 63, and identifies her current address
3 as 400 Slobe Avenue, Sacramento, CA 95815-4211.

4 35. Attached hereto as Exhibit "DD" is a true and correct copy of a printout of the first
5 page of a search of the SearchPeopleFree database which reveals a Kimberly J Mueller, age 63,
6 married to Robert Johnston Slobe, whose address as 400 Slobe Ave., Sacramento, CA 95815-4211.

7
8 **Timeliness**

9 36. CERT has never before filed a motion to disqualify any federal judge.

10 37. CERT has never filed any case in the Eastern District of California, and with the
11 exception of this case, CERT has never been a party to any action venued in the Eastern District of
12 California.

13 38. At the time that CERT filed its motion to intervene in this case as an intervenor-
14 defendant, I was unaware of Judge Mueller, her husband, her husband's business, and their
15 relationships with any California Chambers of Commerce. At the time I had no reason to suspect
16 that any conflict of interest might exist on the part of Judge Mueller.

17 39. Throughout the pendency of this case through the first half of August, 2021, I
18 remained unaware of any facts that could possibly give rise to a conflict of interest on the part of
19 Judge Mueller. It was not until this month that I received any information about any potential
20 conflict of interest on the part of Judge Mueller.

21 40. Although this case was filed in October 2019 and has been pending for about 22
22 months, this case is still in its early stages, because CERT has not yet filed an answer to the
23 complaint, the parties have not yet made initial disclosures pursuant to Rule 26, the parties have not
24 yet made their initial disclosures, all discovery in this case has been stayed, and the Rule 26(f)
25 conference has not yet taken place. Indeed, most of the litigation in this case to date has concerned
26 motions to dismiss and to abstain, and recently, motions for intervention. Most critically, the Court
27 has not made any factual determinations regarding the merits of this case. Although the Court did
28 grant CalChamber's motion for a preliminary injunction, the Ninth Circuit has stayed that order

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 pending the hearing on CERT’s appeal of that order as an unlawful prior restraint of CERT’s
2 expressive rights under the First Amendment. Therefore, this case is still in its “infancy” and this
3 motion is being brought promptly upon ascertaining those facts which support disqualification, none
4 of which were disclosed by Judge Mueller at any time during the past 22 months.
5

6 **Facts Giving Rise To This Motion**

7 41. I am informed and believe that Judge Mueller is married to Robert Johnston Slobe,
8 great-grandson of D.W. Johnston, “the man who launched development north of the American River
9 a century ago.” (See Exhibit “A”)

10 41. Robert Slobe has long been affiliated with California Chambers of Commerce. Prior
11 to 2004, and apparently as early as 1995, Robert Slobe was President of the North Sacramento
12 Chamber of Commerce. (See Exhibits “B” and “C”)

13 42. In 2004, Robert Slobe was a Member of the Board of the North Sacramento Chamber
14 of Commerce. (See Exhibit “D”) From 2005 to 2007 Robert Slobe was a Board Member of the
15 Sacramento Metro Chamber of Commerce (See Exhibit “E”)

16 43. The North Sacramento Chamber of Commerce website currently has a webpage titled
17 “Connecting Business” which has 7 photographs of members, one of which is a photograph of
18 Robert Slobe and Judge Mueller. (See Exhibit “F”)

19 44. At the present time and since at least April 2019, the North Sacramento Chamber of
20 Commerce’s principal office address has been [REDACTED] - the
21 business address of Robert Slobe and his business, North Sacramento Land Company. (See Exhibit
22 “G”) Prior to 2019 and at least as early as September 2017, the address of North Sacramento
23 Chamber of Commerce’s Secretary and Agent for Service of Process was also [REDACTED]

24 Slobe’s property and business address. (See Exhibit “H”)

25 45. The relationship between the North Sacramento Chamber of Commerce and the
26 plaintiff in this case, the California Chamber of Commerce (CalChamber), is described on webpages
27 of both of these organizations. The North Sacramento Chamber of Commerce’s website has a
28 webpage titled “Advocacy” which contains a heading “Stronger Together.” Appearing under the

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 “Stronger Together” heading are the logo of the California Chamber of Commerce, the name
2 “CalChamber,” and the following text: “The [North Sacramento] Chamber works with the
3 Sacramento Metro Chamber, the Cal Chamber and US Chamber on policy and advocacy The
4 North Sacramento Chamber of Commerce is a member of the US Chamber of Commerce, Cal
5 Chamber and the Sacramento Metro Chamber of Commerce. Working together with our local
6 chambers of commerce we are a solid force as advocates for business-friendly policies and helping
7 businesses comply with complex laws and regulations. Working with our National, State and
8 Regional Chambers, as well as with other chambers and business organization across our region,
9 allows our Chamber to be a part of a broad-based network of thousands of businesses and
10 organizations with clout and influence to advocate your best interests, and keep you informed in this
11 ever changing regulatory environment.” (See Exhibit “I”)

12 46. The California Chamber of Commerce website identifies the Sacramento Metro
13 Chamber of Commerce as a member of the California Chamber of Commerce. (See Exhibit “J”) The
14 California Chamber of Commerce (CalChamber) also has a webpage regarding its relationship with
15 local chambers of commerce. This webpage is titled “THE CALCHAMBER and LOCAL
16 CHAMBERS: A Profitable Partnership.” It says: “Working together, the California Chamber of
17 Commerce and local chambers of Commerce are a solid force as advocates supporting business-
18 friendly policies and helping California businesses comply with complex laws and regulations.” The
19 following text appears at the bottom of this webpage: “CalChamber and Local Chambers of
20 Commerce: A win-win partnership for the local chamber and its members.” (See Exhibit “K”)

21 47. Robert Slobe is President of the North Sacramento Land Company (NSLC). (See
22 Exhibit “L”) He has been President of the NSLC for at least 16 years. (See Exhibit “M”) The NSLC
23 was incorporated (by Slobe’s family) in 1910. (See Exhibit “N”) The Directors of NSLC have been
24 members of the Slobe family: Robert Slobe’s mother - Carolyn Slobe, Robert Slobe, and Jack Greer,
25 all of whom provided the same address to the Secretary of State: [REDACTED],
26 [REDACTED] (See Exhibit “M”) Judge Mueller is aware that her husband is currently the President
27 of NSLC and that his mother previously served in that position; she overhears her husband
28 discussing his business. See *AT&T Mobility LLC v. Yeager* (E.D. Cal., July 21, 2015) 2015 WL

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 4460715.

2 48. The North Sacramento Chamber of Commerce website bears NSLC’s logo and
3 identifies NSLC as one of its “Leadership Circle Sponsor Members,” and NSLC is one of the few
4 “Platinum Members” of the NSLC - the highest level of corporate sponsorship. (See Exhibit “O”)

5 49. Robert Slobe is also a member of the Sacramento Host Committee. (See Exhibit “P”)
6 The membership list of the Sacramento Host Committee identifies Robert J. Slobe of the North
7 Sacramento Land Company as a current member of the Sacramento Host Committee as well as being
8 a member of the Sacramento Host Committee since 2009, and also states that Robert J. Slobe was
9 Chairman of the Sacramento Host Committee in 2016. (See Exhibit “P”)

10 50. The Host Committee comprises 28 business leaders from the greater Sacramento
11 area,” and sponsors the Sacramento Host Breakfast, which “features [an] address[] from . . the Chair
12 of the California Chamber of Commerce Board of Directors.” (See Exhibit “Q”) “[M]embers of
13 the CalChamber Board of Directors” “receive special recognition” from the Sacramento Host
14 Committee at the Sacramento Host Breakfast. (See *id.*)

15 51. I am informed and believe that the Sacramento Host Committee was formed in 1933.
16 “Reports indicate that members of the California Chamber of Commerce Board of Directors were
17 honored guests” and “have been honored at every breakfast since.” (See Exhibit “R”) “In
18 conjunction with the longstanding participation of its Chair and Board of Directors at the host
19 Breakfast, the California Chamber of Commerce has provided staff support for the event, and now
20 also shares in planning with the Sacramento Host Committee.” (See Exhibit “Q”) The email contact
21 for the Sacramento Host Committee, as indicated on the Sacramento Host Committee website, is
22 events@calchamber.com. (See Exhibit “S”)

23 52. On its own website, CalChamber states that “[t]he Sacramento Host Committee, made
24 up of Sacramento business leaders, shares the planning and expenses for the [Sacramento Host]
25 breakfast and a reception for out-of-town breakfast guests the evening before the breakfast with the
26 California Chamber of Commerce. For many years, the breakfast has been held in conjunction with
27 the CalChamber update on top legislative issues.” (See Exhibit “T”) In addition, a recent article
28 says the “annual Sacramento Host Breakfast . . . has always been hosted by the volunteer Sacramento

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES

1 Host Committee and organized by the California Chamber of Commerce.” (See Exhibit “U”)

2 53. According to the Yelp webpage for North Sacramento Land Company, “The North
3 Sacramento Land Company was founded in 1910” and is “[p]rimarily a land sales operation” which
4 started “with 4400 acres.” “The company still exists today as an owner of warehouse and office
5 lessor and owns a 7500 acre cattle and almond ranch in Colusa County. It is currently run by Robert
6 Johnston Slobe, great grandson of D.W. Johnston.” (See Exhibit “V”)

7 54. According to the FDA, roasted almonds contain 100-160 ppb acrylamide, whereas
8 unroasted almonds contain < 10 ppb acrylamide. (See Exhibit “W”) These levels result in
9 exposures well in excess of the No Significant Risk Level for acrylamide of 0.2 µg/day. (See
10 Exhibit “X”) The cancer hazard of acrylamide exposure from consumption of roasted almonds has
11 been recognized by California Almonds, the Almond Board of California, which sponsored a study
12 that reported a mean value of 178 ppb acrylamide in roasted almonds. (See Exhibit “Y”)

13 55. In its press release touting this Court’s issuance of its preliminary injunction
14 enjoining the filing of all Proposition 65 cases regarding acrylamide in food, Cal Chamber explained
15 that acrylamide is formed “as a result of cooking or heating certain foods, such as . . . roasted nuts
16” (See Exhibit “Z”)

17 56. To date, 212 Proposition 65 notices of violations regarding almonds have been issued
18 by private enforcers. (See Exhibit “AA”)

19
20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed August 25, 2021, at Long Beach, California.

22 /s/ Nancy Quam-Wickham

23 NANCY QUAM-WICKHAM, Chief Financial Officer,
24 COUNCIL FOR EDUCATION AND
25 RESEARCH ON TOXICS (“CERT”)

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2021, I caused the foregoing document, described as **DECLARATION OF NANCY QUAM-WICKHAM IN SUPPORT OF MOTION OF INTERVENOR-DEFENDANT, COUNCIL FOR EDUCATION AND RESEARCH ON TOXICS (“CERT”), TO DISQUALIFY THE HON. KIMBERLY J. MUELLER**, to be electronically filed with the Court’s CM/ECF filing system, which will send a *Notice of Electronic Filing* to all parties of record who are registered with CM/ECF:

Trenton H. Norris, Esq.
Sarah Esmaili, Esq.
S. Zachary Fayne, Esq.
David M. Barnes, Esq.
Arnold & Porter Kaye Scholer LLP
Three Embarcadero Center, 10th Flr.
San Francisco, CA 94111-4024
(Plaintiff)
Telephone: (415) 471-3100
email: trent.norris@arnolderporter.com

Harrison Pollak, Deputy Attorney General
Joshua Purtle, Deputy Attorney General
Laura J. Zuckerman, Deputy Attorney General
Office of the Attorney General
1515 Clay St., 20th Flr.
Oakland, CA 94612
(Defendant)
Telephone: (510) 879 0098
email: harrison.pollak@doj.ca.gov
joshua.purtle@doj.ca.gov
laura.zuckerman@doj.ca.gov

Aida Poulsen, Esq.
Poulsen Law P.C.
282 11th Ave., Suite 2612
New York, NY 10001
(Proposed Intervenor Defendants)
email: ap@poulsenlaw.org

I declare that I am employed in the offices of a member of this court, at whose direction service was made.

Executed on August 25, 2021, at Long Beach, California.

/s/ Nina S. Vidal

Nina S. Vidal, Declarant

updated 08/13/21 nsv

TELEPHONE (562) 437-4499
TOLL-FREE (877) TOX-TORT
TELECOPIER (562) 436-1561
WWW.TOXCTORTS.COM

METZGER LAW GROUP
A PROFESSIONAL LAW CORPORATION
555 EAST OCEAN BOULEVARD, SUITE 800
LONG BEACH, CALIFORNIA 90802

PRACTICE CONCENTRATED IN TOXIC
TORT & ENVIRONMENTAL LITIGATION
OCCUPATIONAL & ENVIRONMENTAL LUNG
DISEASE, CANCER, AND TOXIC INJURIES