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I, AMY MICKEL, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, and am competent to testify thereto if called as a witness in this matter.

2. I am Professor of Management in the College of Business Administration at California State University, Sacramento. I have been retained by counsel for the plaintiffs in this action to serve as a consultant. I hold a Ph.D., in Human Resources and Organizational Behavior from the University of Washington. In addition to teaching in the undergraduate and graduate (International MBA and MBA) business program, I conduct research which has been published in prestigious an international journals.

3. I have read the allegations contained in pages 20-25 of the Complaint styled JEM Farms, LP, et al., Plaintiffs, vs. California Department of Water Resources, et al., Defendants. I have also reviewed the Motion to Strike, filed by the Defendant, California Department of Water Resources.

4. If one assumes the truth of the allegations set forth in Pages 20-25, alleging that, over the decades, DWR management at the Oroville Dam was openly hostile to women and minorities, and perpetuated a toxic culture and hostile work environment, it is my professional opinion that such conduct would more likely than not affect the ability of employees to effectively perform their jobs, including jobs related to the safety and maintenance of the Oroville Dam.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 31 2019, at Sacramento, California.

DATED: January 31, 2019


AMY MICKEL

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