

1 JOSEPH W. COTCHETT (SBN 036324)

jcotchett@cpmlegal.com

2 NIALL P. McCARTHY (SBN 160175)

nmccarthy@cpmlegal.com

3 ERIC J. BUESCHER (SBN 271323)

ebuescher@cpmlegal.com

4 MALLORY A. BARR (SBN 317231)

mbarr@cpmlegal.com

5 **COTCHETT, PITRE & McCARTHY, LLP**

San Francisco Airport Office Center

6 840 Malcolm Road

Burlingame, CA 94010

7 Telephone: (650) 697-6000

8 Facsimile: (650) 697-0577

9
10 JAMES V. NOLAN (SBN 84239)

jvnolan@yololaw.com

11 DAVID W. JANES (SBN 71334)

dwjanes@yololaw.com

12 **GARDNER, JANES, NAKKEN, HUGO & NOLAN**

13 429 First Street

Woodland, CA 95695

14 Telephone: (530) 662-7367

15 Facsimile: (530) 666-9116

BY FAX

16 *Attorneys for Plaintiffs*

17
18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

19 **IN AND FOR THE COUNTY OF SACRAMENTO**

20
21 Coordinated Proceeding
22 Special Title (Rule 3.550)

JCCP NO. 4974

Assigned to: James E. McFetridge, Dept. 30

23 **OROVILLE DAM CASES**

24 **DECLARATION KIMBERLEE SHAUMAN,**
25 **Ph.D., IN SUPPORT OF OPPOSITION TO**
26 **MOTION TO STRIKE**

Date: February 15, 2019

Time: 10:00 a.m.

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

I, KIMBERLEE SHAUMAN, declare as follows:

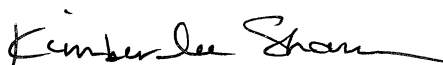
1. I have personal knowledge of the facts set forth in this Declaration, and am competent to testify thereto if called as a witness in this matter.

2. I am a Professor of Sociology, and a member of the faculty of the Department of Sociology at U.C. Davis. I have been retained by counsel for the plaintiffs in this action to serve as a consultant. I hold a B.A in Sociology, an M.A, in Sociology and a Ph.D., in Sociology from the University of Michigan. I teach a wide variety of Sociology subjects to undergraduates and Graduate students at U.C. Davis.

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 productively perform their jobs, including jobs responsible for Oroville Dam safety.

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 30, 2019, at Davis, California.



KIMBERLEE SHAUMAN

ALU:\ORO_DAM_CASES\Coordination\DWR-Mo-2-Strike\20190129-Expert-Declaration-Kimberlee-Shauman