HOLLAND & KNIGHT LLP
Charles L. Coleman III (SBN 65496)
David I. Holtzman (SBN 299287)
50 California Street, 28th Floor
San Francisco, CA 94111
Telephone: (415) 743-6970
Facsimile: (415) 743-6910
Email: charles.coleman@hklaw.com
david.holtzman@hklaw.com

Attorneys for Plaintiff
COUNTY OF LOS ANGELES

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

STATE OF CALIFORNIA, *et al.*, Plaintiffs, v. WILBUR L. ROSS, JR., *et al.*, Defendants.	Case No.: 3:18-cv-01865-RS **DECLARATION OF DOUGLAS S. BARON ON BEHALF OF THE COUNTY OF LOS ANGELES IN OPPOSITION TO DEFENDANTS ROSS, *ET AL.*'S MOTION FOR SUMMARY JUDGMENT** Date: December 7, 2018 Time: 10:00 a.m. Before: Hon. Richard Seeborg Courtroom: 3

Holland & Knight LLP
50 California Street, Suite 2800
San Francisco, CA 94111
Tel: (415) 743-6900
Fax: (415) 743-6910

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San Francisco, CA 94111
Tel: (415) 743-6900
Fax: (415) 743-6910

I, Douglas S. Baron, hereby declare:

1. I am a Senior Manager with the Chief Executive Office ("CEO") of the County of Los Angeles ("the County"). I have been a manager at CEO for over two years, and have worked for the County of Los Angeles in various capacities on fiscal matters for over 17 years. I hold a Bachelor of Arts degree from Princeton University and a Master of Business Administration degree from Stanford University.

2. My responsibilities as Senior Manager, CEO for the County include overseeing the Economic Development Division within the CEO. My responsibilities include working on planning and budgeting matters relating to the conduct of the 2020 Census within the County.

3. I have been authorized by County Counsel to submit this Declaration on behalf of the County in opposition to the motion for summary judgment of defendants Wilbur Ross, *et al.* Except as otherwise stated below, I have personal knowledge of all facts contained in this Declaration, and if called upon to do so could testify competently to those facts under oath in a court of law, without waiver of any applicable privilege.

4. The County's plans regarding the 2020 Census include plans and preparations for outreach to County residents in advance of the 2020 Census to ensure an accurate and complete count.

5. On May 18, 2018, the County's Sacramento Legislative Office sent a written request to the California Legislature seeking additional outreach funding for the County. A true copy of that written request is attached hereto as **Exhibit A**.

6. The County's written request to the Legislature (Exhibit A) requested an increase in census funding from $8.7 million to $12 million and recited that the increased request for funding was "due to the United States Commerce Department's announcement that a citizenship question will be included in the 2020 Census Form." In its written request, the County included a breakdown seeking an additional $1,700,000 for "Outreach to the Entire Immigrant Non-Citizen Population" plus an additional $1,500,000 for "Outreach to Population with Undocumented Family Member Living in the Same Household".

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7. On or about November 9, 2018, the State of California announced its funding allocations, to be disbursed pursuant to a "County-Optional Agreement to Conduct Outreach Related to the California Complete Count (CCC) 2020 Census." The announced funding allocations were set out as Attachment II to a form letter received by the County CEO and (on information and belief) other counties throughout the State of California . I attach hereto as **Exhibit B** a true copy of the two-page cover letter (minus its exhibits) and Attachment II to the letter, which lists the amount allocated to the County as $9,393,090, rather than the $12,000,000 requested by the County in Exhibit A.

8. The amount allocated to the County by the State for purposes of the 2020 Census also is listed on the State's website, at https://census.ca.gov/wp-content/uploads/sites/4/2018/11/County-Contract-Amounts.pdf. A printed copy of this online listing, showing the amount allocated to the County as $9,393,090, is attached hereto as **Exhibit C**.

9. The $9,393,090 amount allocated by the Legislature for the 2020 Census is $2,606,910 below the $12,000,000 amount the County determined to be necessary for outreach in Exhibit A in view of the addition of the citizenship question.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that I have executed this declaration in Los Angeles, California.

Dated: November 16, 2018

/s/ Douglas S. Baron
DOUGLAS S. BARON