	D-C-010
ATTORNEY OR PARTY WITHOUT ATTORNEY (NAME AND ADDRESS): TELEPHOLE	
DAN SIEGEL (510) 839-1200	*12650713*
056400 (510) 444-6698	
SIEGEL & YEE	
499 14th Street, Suite 300	ILED
Uakland, CA 94612	DA COUNTY
	e_ /
Insert name of court, judicial district or branch court, if any, and post office and street address: Superior Court, County of Alameda	29 2014
Superior court, country of Arameda	, - ,,
CLERK OF THE	SUPERIOR VETER
1225 Fallon Street	4/1/
Oakland, CA 94612	Deputy
PLAINTIFF:	
PACIFICA REPORTERS AGAINST CENSORSHIP	
DEFENDANT:	
PACIFICA FOUNDATION RADIO	
ANSWER - Contract	NUMBER:
I FEED COMPLAINTEDE / L.A. DACTUTON DUDODUUDO NCATNICH!	4722004
TO CROSS-COMPLAINT (name):	
1. This pleading, including attachments and exhibits, consists of the following number of pages:	4
2. DEFENDANT (name): PACIFICA FOUNDATION RADIO	/
Z. DEI ENDAM (Manay).	
answers the complaint or cross-complaint as follows:	
3. Check ONLY ONE of the next two boxes:	
a. Defendant generally denies each statement of the complaint or cross-complaint. (Do no	ot check this box if
the verified complaint or cross-complaint demands more than \$1,000.)	
b. X Defendant admits that all of the statements of the complaint or cross-complaint are true	EXCEPT:
(1) Defendant claims the following statements are false (use paragraph numbers or exp	olain):
Continued on Attachment 3.b.(1).	
(2) Defendant has no information or belief that the following statements are true, so de	fendant denies them
(use paragraph numbers or explain):	
$3 - (1) \cdot 3 + 3 \cdot 4 + (1) \cdot 7 \cdot 3 \cdot 10 \cdot 3 \cdot 10 \cdot 10 \cdot 10 \cdot 10 \cdot 10 \cdot$	rst Cause of
$\lambda_{\alpha+1}$	Id Cause Oi
RC-1 a: $RC-2$: $RC-3$: $RC-4$: $RC-6$: RC	Cause
cf Action, QM-1; QM-2; QM-4; Fourth Cause of A	ACCIOII,
UE-1; UE-2; UE-3.	
Continued on Attachment 3.b.(2).	· ·

-

E NUMBER:

PACIFICA REPORTERS v. PACIFICA

RG14722004

ANSWER-Contract

4. X AFFIRMATIVE DEFENSES

Defendant alleges the following additional reasons that plaintiff is not entitled to recover anything:

(1) The contract(s) at issue were not executed by a representative of the Pacifica Foundation with proper actual or apparent authority.

Continued	on Attachment	4
-----------	---------------	---

5. Other:

6. DEFENDANT PRAYS

- a. that plaintiff take nothing.
- b. X for costs of suit.
- c. other (specify):

DAN SIEGEL

(Type or print name)

(Signature of party or attorney)

PLD-C-010 [Rev. January 1, 2007]

Martin Dean's

ESSENTIAL FORMSTM

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF Alameda

ı	have read	the	foregoing	Answer	_	Contract
•	Have Ica	J 1110	101 EUUII IU	TITO M CT		COLLEGE

and know its contents.		
CHECK APPLICA	BLE PARAGRAPHS	
I am a party to this action. The matters stated in the foregoing d matters which are stated on information and belief, and as to those r	The state of the s	
I am I an Officer a partner of Pacifica For a party to this action, and am authorized to make this verification for am informed and believe and on that ground allege that the materials is a second of the pacific and a partner of Pacifical Formula and Pacifical For		, Hore
stated in the foregoing document are true of my own knowledge exceeding, and as to those matters I believe them to be true.		ile i
<u>.</u> '	ned and believe and on that ground allege that the matters Oakland, California.	,
I declare under penalty of perjury under the laws of the State of Cal	ornia that the foregoing is true and correct.	
Margy Wilkinson	Margy Williams	
TYPE OR PRINT NAME PROOF OF SER		
1013a (3) CCP Revis	ed 2004	٠.
I am employed in the county of	, State of California	a.
I am over the age of 18 and not a party to the within action; my busin	iess address is:	
On	, I served the foregoing document described	d a
on by placing the true copies thereof enclosed in sealed envelopes by placing the original a true copy thereof enclo	in this ac s addressed as stated on the attached mailing list: sed in sealed envelopes addressed as follows:	otio
BY MAIL		
*I deposited such envelope in the mail at	, Californi	ia.
The envelope was mailed with postage thereon fully prepaid.		
that practice it would be deposited with U.S. postal service on the	collection and processing correspondence for mailing. Under hat same day with postage thereon fully prepaid at erdinary course of business. I am aware that on motion of the	
party served, service is presumed invalid if postal cancellation of deposit for mailing in affidavit.		
Executed on , at	, California	3 .
**(BY PERSONAL SERVICE) I delivered such envelope by he		
Executed on , at (State) I declare under penalty of perjury under the laws of	, California the State of California that the above is true and correct.	1.
_	per of the bar of this court at whose direction the service was	
TYPE OR PRINT NAME	SIGNATURE	
c on room .	*(BY MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOP MAIL SLOT BOX OR BAG)	E IN

**(FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

one in the second of the secon	POS-030
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bal number, and address):	FOR COURT USE ONLY
DAN SIEGEL 056400	
SIEGEL & YEE	,
499 14th Street, Suite 300	
Oakland, CA 94612	
(=10) 000 1000	
TELEPHONE NO.: (510) 839-1200 FAX NO. (Optional): (510) 444-0000 E-MAIL ADDRESS (Optional): DanMSiegel@gmail.com	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Alameda	
MAILING ADDRESS: CITY AND ZIP CODE: Oakland, CA 94612	·
BRANCH NAME: PETITIONER/PLAINTIFF: PACIFICA REPORTERS AGAINST CENSORSHIP	
PETITIONER/PLAINTIFF: PACTIFICA REPORTERS AGAINST SERVICE	
RESPONDENT/DEFENDANT: PACIFICA FOUNDATION RADIO	
RESPONDENT/DEFENDANT: PACIFICA FOUNDATION REDIC	
	CASE NUMBER:
PROOF OF SERVICE BY FIRST-CLASS MAIL - CIVIL	RG14722004
(Do not use this Proof of Service to show service of a Sum	mons and Complaint.)
1. I am over 18 years of age and not a party to this action. I am a resident of or employ	red in the county where the mailing
	•
took place.	
2. My residence or business address is:	
499 14th Street, Suite 300	
Oakland, CA 94612	
I mailed from (city and state):	Dakland, California
5. On (adio): 1201 = 1	Janzaria, Still-1-1-1
the following documents (specify):	
Answer - Contract	
- Broof of Sonico by First Class Ma	il - Civil (Documents Served)
The documents are listed in the Attachment to Proof of Service by First-Class Man	n - Olvir (Boodinome Gotter)
(form POS-030(D)).	
the state of the s	
4. I served the documents by enclosing them in an envelope and (check one):	the postage fully prepaid
a. depositing the sealed envelope with the United States Postal Service with	one practices. Lam readily familiar with this
b. placing the envelope for collection and mailing following our ordinary busin	a. On the same day that correspondence is
business's practice for collecting and processing correspondence for mailin	g. Of the same day that correspondence to
placed for collection and mailing, it is deposited in the ordinary course of bu	Isiness with the Officed States Fostal Scryice in
a sealed envelope with postage fully prepaid	
5. The envelope was addressed and mailed as follows:	
· · · · · · · · · · · · · · · · · · ·	
a. Name of person served. At all Glegory Worker will of	
b. Address of person served:	
131-A Stony Circle, Suite 500	
Santa Rosa, CA 95401	
The name and address of each person to whom I mailed the documents is lister	d in the Attachment to Proof of Service
The name and address of each person to whom I mailed the documents is listed.	a mana / maammana ta / yaar ar aa maa
by First-Class Mail-Civil (Persons Served) (POS-030(P)).	
I declare under penalty of perjury under the laws of the State of California that the forego	ing is true and correct.
i decidio diluci pondicy of porjety and a series	

Form Approved for Optional Use Judicial Council of California POS-030 [New January 1, 2005]

Date: May 29, 2014

Elizabeth Johnson (TYPE OR PRINT NAME OF PERSON COMPLETING THIS FORM)

Martin Dean's ESSENTIAL FORMS**

SUSNATURE OF PERSON COMPLETING THIS FORM)

Code of Civil Proce PROOF OF SERVICE BY FIRST-CLASS MAIL - CIVIL