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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN DIEGO  
12

13 CALIFORNIA VALLEY MIWOK  
14 TRIBE,

15 Plaintiff,  
16 v.

17 CALIFORNIA GAMBLING CONTROL  
18 COMMISSION, et al.,

19 Defendants.  
20

21 CALIFORNIA VALLEY MIWOK  
22 TRIBE, CALIFORNIA (a.k.a. SHEEP  
23 RANCH RANCHERIA OF ME-WUK  
INDIANS, CALIFORNIA), YAKIMA K.  
DIXIE, VELMA WHITEBEAR,  
ANTONIA LOPEZ, ANTONE  
AZEVEDO, MICHAEL MENDIBLES,  
AND EVELYN WILSON,

24 Intervenors.  
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No: 37-2008-00075326-CU-CO-CTL

DECLARATION OF ROBERT J. URAM  
IN SUPPORT OF INTERVENORS'  
MOTION FOR SUMMARY JUDGMENT  
AND/OR SUMMARY ADJUDICATION

Date: April 26, 2013

Time: 2:00 p.m.

Dept.: C-62

Judge: The Hon. Ronald L. Slyn

1 I, ROBERT J. URAM, do hereby declare:

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3 1. I am a partner with the law firm of Sheppard, Mullin, Richter &  
4 Hampton LLP, attorneys for The California Valley Miwok Tribe ("Tribe"), The Tribal  
5 Council, Yakima Dixie, Velma WhiteBear, Antonia Lopez, Michael Mendibles, Evelyn  
6 Wilson and Antone Azevedo (collectively, "Intervenors").

7  
8 2. On February 9, 2011, on behalf of Intervenors, I filed an  
9 administrative appeal with the Bureau of Indian Affairs ("BIA") Regional Director,  
10 challenging the January 12, 2011 decision by Bureau of Indian Affairs Superintendent  
11 Troy Burdick to recognize the results of a purported Tribal election held by Silvia Burley  
12 on January 7, 2011. Lodged as Exhibit 11 is a true and correct copy of the administrative  
13 appeal. Lodged as Exhibit 10 is a true and correct copy of Troy Burdick's January 7, 2011  
14 letter.

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16 3. As of today, the BIA has not responded to, or decided, the appeal filed  
17 on February 9, 2011.

18  
19 4. On January 24, 2011, I filed a complaint on behalf of Intervenors in  
20 the federal District Court for the District of Columbia, against United States Secretary of  
21 the Interior Ken Salazar and other federal defendants, challenging the issuance of a  
22 decision concerning the Tribe that the Assistant Secretary – Indian Affairs ("AS-IA")  
23 issued on December 22, 2010. The case is California Valley Miwok Tribe v. Salazar,  
24 No. 1:11-cv-00160-RWR (D.D.C.) (CVMT v. Salazar).

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26 5. The AS-IA subsequently rescinded his December 22, 2010 decision  
27 and issued a new decision on August 31, 2011. Intervenors then filed a First Amended  
28 Complaint in CVMT v. Salazar. Lodged as Exhibit 9 is a true and correct copy of the AS-

1 IA's December 22, 2010 decision. Lodged as Exhibit 12 is a true and correct copy of the  
2 AS-IA's April 1, 2011 notice in which he rescinded his December 22, 2010 decision.  
3 Lodged as Exhibit 13 is a true and correct copy of the AS-IA's August 31, 2011 decision.  
4

5 6. Intervenor's First Amended Complaint challenges the AS-IA's  
6 findings in the August 31, 2011 decision regarding the membership and leadership of the  
7 Tribe, including the validity of Silvia Burley's general council and the governing  
8 documents it is based on. Lodged as Exhibit 19 is a true and correct copy of Intervenor's  
9 First Amended Complaint in CVMT v. Salazar.

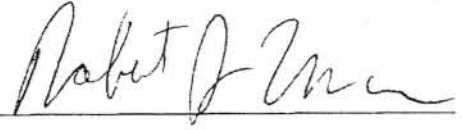
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11 7. Silvia Burley, filing in the name of the Tribe, intervened in CVMT v.  
12 Salazar. Burley, the federal defendants and Intervenor's have all filed dispositive motions  
13 in CVMT v. Salazar and await the court's ruling on those motions. The case remains  
14 pending. Lodged as Exhibit 17 is a true and correct copy of the Civil Docket Report for  
15 CVMT v. Salazar.

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17 8. If the federal court grants Intervenor's motion for summary judgment  
18 in CVMT v. Salazar and grants the requested relief, it will invalidate the AS-IA's August  
19 31 decision, and the prior BIA decisions that deny recognition of any Tribal government  
20 would remain in effect. Lodged as Exhibit 18 is a true and correct copy of Intervenor's  
21 motion for summary judgment in CVMT v. Salazar.

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23 9. Lodged as Exhibit 15 is a true and correct copy of a Memorandum  
24 Opinion and Order in CVMT v. Salazar.

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26 10. Lodged as Exhibit 14 is a true and correct copy of a Joint Status  
27 Report that was filed in CVMT v. Salazar.

1 I declare under penalty of perjury pursuant to the laws of the State of  
2 California that the foregoing is true and correct. Executed March 6, 2013 at San Francisco,  
3 California.

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8 Robert J. Uram  
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