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9 Attorneys for Plaintiffs - Devon Torrey-Love, S.L.,
10 Courtney Barrow, A.B., Margaret Sargent, M.S.,
11 W.S., and A Voice for Choice, Inc.

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

14 DEVON TORREY-LOVE; S.L.;
15 COURTNEY BARROW; A.B.;
16 MARGARET SARGENT; M.S.;
17 W.S.; and A VOICE FOR CHOICE,
18 INC. on behalf of its members,
19
20 Plaintiffs,

21 v.

22 STATE OF CALIFORNIA,
23 DEPARTMENT OF EDUCATION;
24 STATE OF CALIFORNIA, BOARD
25 OF EDUCATION; TOM
26 TORLAKSON, in his official
27 capacity as Superintendent of the
28 Department of Education; STATE
OF CALIFORNIA, DEPARTMENT
OF PUBLIC HEALTH; DR.
KAREN SMITH, in her official
capacity as Director of the
Department of Public Health;
EDMUND G. BROWN JR., in his
official capacity as Governor of
California; KAMALA HARRIS, in
her official capacity as Attorney
General of California,

Defendants.

Case No.: 5:16-cv-2410

**AFFIDAVIT OF CHRISTINA E. I.
VON DORRER-HILDEBRAND IN
SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’
MOTION TO DISMISS**

Date: January 13, 2017
Time: 10:00 a.m.
Judge: The Honorable Dolly M. Gee
Location: Courtroom 8C, 8th Floor

1 I, Christina E. I. von Dorrer-Hildebrand, declare:

2 1. I am the Founder and President of A Voice For Choice, Inc., A
3 California Not-For Profit Corporation, and a current Plaintiff in the matter entitled
4 Love v. State of California, *Case No.: 5:16-cv-2410* , as filed in the United States
5 District Court, Central District of California, Eastern District (the “Matter”). I have
6 personal knowledge of all matters and facts set forth herein and could and would
7 competently testify thereto if called upon to do so.

8 2. A Voice For Choice, Inc. (“AVFC”) was formed as a Not-For Profit
9 Corporation with the California Secretary of State on December 1, 2015.

10 3. One of the primary stated purposes of AVFC is to educate and protect
11 the rights of individuals and ensure that the general public has knowledge of and a
12 choice in what medications are put into the bodies of their children and themselves.

13 4. To date, AVFC has approximately Four Hundred and Fifty (450)
14 members.

15 5. A significant number of AVFC’s membership includes individuals
16 who question the constitutionality of the decree that is CA Senate Bill 277, and the
17 subsequent CA Health & Safety Codes, namely Section 120325, *et seq.* (“Section
18 120325”) and what right any governmental or legislative body has to mandate that
19 an individual forego one fundamental right for another. Moreover, the general
20 membership of AVFC is comprised, in part, of individuals that are California
21 citizens who have school aged children that are not fully vaccinated in accord with
22 the requirements of Section 120325, and desire to exercise their fundamental right
23 to parent, as well as their right to bodily autonomy, to refuse medical treatments,
24 and for their children to receive a public-school education, as specifically afforded
25 by and through California’s Constitution.

26 6. The members of AVFC are individuals who are and continue to be
27 equally harmed as a result of the ongoing enforcement of Section 120325 and
28

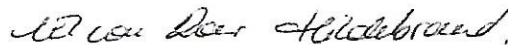
1 would otherwise have the right and ability to sue the Defendants in their own right
2 in this matter should they have been named as an individual Plaintiff.

3 7. Because there is a sizable number of members within AVFC that have
4 been harmed by Section 120325, AVFC has named itself as a Plaintiff in the Matter
5 on behalf of all such members.

6 8. The primary purpose of the Matter, to stop any and all further
7 enforcement of Section 120325, *et seq.* by the State of California is specifically in
8 line with and germane to the purpose for AVFC's existence.

9
10 I declare under penalty of perjury under the laws of the State of California
11 that the foregoing is true and correct.

12
13 Executed at SAN JOSE, California, on December 22, 2016.

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15 
16 Christina E. I. von Dorrer-Hildebrand

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ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara)

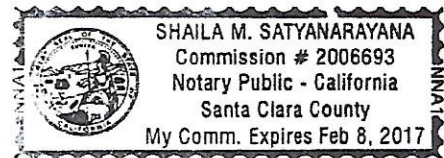
On 12-22-16 before me, Shaila M Satyanarayana, Notary Public
(Insert name and title of the officer)

personally appeared Christina E. I. von Dorrer - Hildebrand

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to within the instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature [Handwritten Signature] (Seal)