

1 Kevin I. Shenkman (SBN 223315)  
Mary R. Hughes (SBN 222662)  
2 Andrea A. Alarcon (SBN 319536)  
**SHENKMAN & HUGHES**  
3 28905 Wight Road  
Malibu, California 90265  
4 Telephone: (310) 457- 0970

5 R. Rex Parris (SBN 96567)  
Ellery S. Gordon (SBN 316655)  
6 **PARRIS LAW FIRM**  
43364 10th Street West  
7 Lancaster, California 93534  
Telephone: (661) 949-2595

8 Milton C. Grimes (SBN 59437)  
**LAW OFFICES OF MILTON C. GRIMES**  
9 3774 West 54th Street  
Los Angeles, California 90043  
10 Telephone: (323) 295-3023

11 Robert Rubin (SBN 85084)  
**LAW OFFICE OF ROBERT RUBIN**  
12 237 Princeton Avenue  
Mill Valley, CA 94941  
13 Telephone: (415) 298-4857

14 Attorneys for Plaintiffs

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **COUNTY OF SAN BERNARDINO**

17 PICO NEIGHBORHOOD )  
ASSOCIATION and MARIA LOYA, )  
18 Plaintiffs, )  
19 v. )  
20 CITY OF SANTA MONICA, and )  
DOES 1 through 100, inclusive, )  
21 Defendants. )  
22 )  
23 )  
24 )

**Case No.: BC616804**  
**DECLARATION OF MARY RUTH HUGHES IN SUPPORT OF PLAINTIFFS' OPPOSITION TO MOTION TO TAX COSTS**  
Date: June 25, 2019  
Time: 9:30 a.m.  
Dept.: 44

25 \_\_\_\_\_

26  
27  
28

1 I, Mary Ruth Hughes, declare as follows:

2 1. I am an attorney duly licensed to practice law before all courts of the State of  
3 California and I am a principal of Shenkman & Hughes PC, attorneys of record for Plaintiffs  
4 in the above-captioned case. The facts set forth in this declaration are within my personal  
5 knowledge and, if called as a witness, I could and would competently testify as follows:


6 2. From 2002 through 2010, I was an associate with the law firm of Gibson Dunn  
7 & Crutcher LLP, and before that I was a summer associate with Gibson Dunn & Crutcher  
8 LLP. During my eight years at Gibson Dunn & Crutcher, I worked on both corporate  
9 transactional and litigation matters. For example, I was part of the teams that represented  
10 Encana Corp. and MCI WorldCom Inc., respectively, in litigation matters. In my litigation  
11 work at Gibson Dunn & Crutcher, I took and defended depositions, researched and drafted  
12 briefs, and worked with expert witnesses, among other things. In connection with my  
13 litigation work at Gibson Dunn & Crutcher, I was occasionally required to travel – for  
14 example, I was required to travel to San Francisco in my work for Encana Corp. and I was  
15 required to travel to Washington D.C. in my work for MCI WorldCom Inc. I understand  
16 that Gibson Dunn & Crutcher billed separately for my travel expenses on those occasions.

17 3. In 2011, upon establishing Shenkman & Hughes, we created a website for the  
18 purpose of marketing our firm's services. At that time, we wanted to attract corporate  
19 clients and show potential corporate clients that we could handle nearly all of their legal  
20 needs, so I drafted a bio that focused on my corporate transactional experience, while my  
21 partner Kevin Shenkman's bio focused on his litigation experience, particularly intellectual  
22 property litigation. Our firm and our work changed drastically over the subsequent few  
23 years, but we have not changed our website since 2011. Since 2012, the majority of my  
24 work, and the work of our firm generally, has been on voting rights litigation, including the  
25 above-captioned case. The fact that our website does not mention voting rights litigation, or  
26 any other work we have done since the website was created in 2011, is a reflection of our  
27 firm's evolution – now having no need to market our services with a website – not a  
28 reflection of the work we have done since 2011.

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

Executed this 11th day of June 2019, at Malibu, California.

  
\_\_\_\_\_  
Mary Ruth Hughes