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9 Attorneys for Defendants Margaret Thaler  
10 Singer and Janja Lalich

PLF'S Ex. 2 for Ident.  
Witness STEVEN PRESSMAN  
Date 6-5-97  
RALPH L. CISTARO, CSR

11  
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF SAN FRANCISCO

14 LANDMARK EDUCATION CORPORATION, )  
15 a corporation, )

16 Plaintiff, )

17 vs. )

18 MARGARET THALER SINGER, an )  
19 individual, JANJA LALICH, an )  
20 individual, and DOES 1 through )  
21 100, inclusive, )

22 Defendants. )

Case No. 976037

DECLARATION OF STEVEN PRESSMAN  
IN SUPPORT OF DEFENDANTS'  
SPECIAL MOTION TO STRIKE  
COMPLAINT

[CCP § 425.16]

DATE: May 1, 1996

TIME: 9:30 a.m.

PLACE: Dept. 10

23 I, Steven Pressman, state and declare:

24 1. I am an author and currently work as an editor for  
25 the *San Francisco Daily Journal*. I have personal knowledge of the  
26 matters set forth in this declaration and could competently testify  
27 thereto if called as a witness.

28 2. In 1993, St. Martin's Press published a book that I  
29 had written entitled Outrageous Betrayal: The Dark Journey of  
30 Werner Brnard from est to Exile ("Outrageous Betrayal"). That book

1 took a critical look at Werner Erhard and the training programs and  
2 projects he created, including est and The Forum.

3 3. On numerous occasions while I was writing the book,  
4 I tried to interview employees of Landmark Education Corporation  
5 ("Landmark"), including Harry and Joan Rosenberg, whom I understood  
6 and understand to be Werner Erhard's brother and sister. No one at  
7 Landmark would agree to an interview or otherwise to provide me  
8 with information related to the book.

9 4. Long before Outrageous Betrayal was even published,  
10 my publisher and I received numerous threats of litigation. Both  
11 Walter P. Maksym, Esq., acting on behalf of Werner Erhard, and Art  
12 Schreiber, Esq., acting on behalf of Landmark as its attorney and  
13 corporate officer, threatened to sue us for libel. They both said  
14 that Werner Erhard and Landmark would seek to hold me personally  
15 accountable in any lawsuit.

16 5. At the time of the threats, the book had not yet  
17 been published, and I had not sent a copy of the manuscript to  
18 anyone. Mr. Maksym requested me to send him a copy of the  
19 manuscript prior to publication for purposes of identifying what he  
20 deemed to be "objectionable." I believe Mr. Schreiber made a  
21 similar request. I declined to comply with the request.

22 6. In Outrageous Betrayal, I wrote that an organization  
23 called the Global Hunger Project ("Project") was created by Werner  
24 Erhard. I also wrote that, based on extensive research, I believed  
25 that the main purpose of the Project from 1977 to 1990 was not to  
26 eradicate world hunger as the Project claims, but rather to spread  
27 est's message of how to achieve personal transformation. According  
28 to my book, est emerged as The Forum in 1985, and the Project

1 continued to operate with the same purpose and in the same fashion  
2 throughout the 1977 - 1990 period.

3 7. On June 23, 1994, the Project filed suit against me,  
4 asserting libel and other related claims. I was the only named  
5 defendant in that action; the Project did not sue the publisher,  
6 St. Martin's Press. I believed then, as I do now, that the lawsuit  
7 was a fulfillment of the threats that I had received earlier from  
8 Messrs. Maksym, Mr. Erhard's lawyer, and Mr. Schreiber, Landmark's  
9 lawyer.

10 8. On February 16, 1995, I filed a special motion to  
11 strike the complaint under Cal. Civ. Proc. Code § 425.16. In  
12 filing that motion, I stated my continued belief that the complaint  
13 was filed in an attempt to stifle the legitimate criticism  
14 described in Outrageous Betrayal.

15 9. While the trial court denied my § 425.16 motion, the  
16 First District of the California Court of Appeal agreed to hear the  
17 appeal of that denial and ordered briefing.

18 10. Before the Court of Appeal decided my appeal, the  
19 Project offered to dismiss its lawsuit if I signed the following  
20 innocuous statement:

21 "Chapter Thirteen of my book 'Outrageous  
22 Betrayal -- The Dark Journey of Werner Erhard  
23 from est To Exile" accurately describes through  
24 1991 the Global Hunger Project as I viewed it.  
25 The book describes no fact, or opinion  
26 concerning the Global Hunger Project or its  
27 operations at any time after 1991."

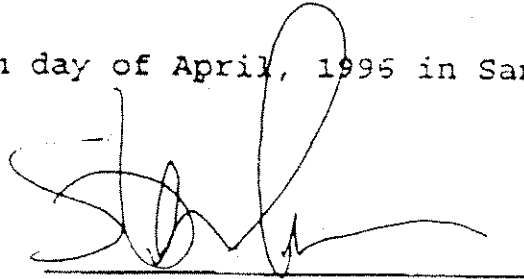
28 11. Because I only wrote about the Project's operations  
between 1977 and 1990, and because I firmly believed that Chapter  
Thirteen accurately described the Project, I had no problems  
signing the statement. After doing so, the Project dismissed its

1 lawsuit with prejudice. A true and correct copy of the settlement  
2 agreement (which contains the statement I signed) is attached  
3 hereto as Exhibit A.

4  
5 I declare under penalty of perjury that the foregoing is  
6 true and correct.

7 Executed this 12th day of April, 1996 in San Francisco,  
8 California.

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Steven Pressman