

EXHIBIT A

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

DECLARATION OF MAITREYA BADAMI:

I, MAITREYA BADAMI declare as follows:

1. I am an attorney, licensed to practice law in the State of California. I am the Assistant Legal Director of the Northern California Innocence Project (NCIP), a non-profit, clinical legal education program developed by faculty of the Santa Clara University School of Law.
2. NCIP receives hundreds of inmate applications each year and, in its 14 years in operation, has screened thousands of such cases. Law students, supervised by faculty and staff, acquire documents, interview witnesses, and search for physical evidence before deciding which cases to litigate. NCIP is a member of the Innocence Network.
3. NCIP has been actively pursuing the Pohlschneider case for several years. Along with law students under my supervision, I have done substantial work to investigate the facts, research the applicable law, and prepare the attached petition. Among the tasks completed, we have read the trial transcript and all documents in the Superior Court's file, the appellate briefs, and the Court of Appeal opinion. Co-counsel and/or I have interviewed Mr. Pohlschneider and each of the adult children, and we have consulted at great length with the experts whose opinions we are presenting in support of the petition.
4. We have spoken with trial and appellate counsel, as well as other individuals associated with the case. Trial counsel did not specifically recall the case when I spoke to him on the telephone. I sent him a summary of the trial transcript to refresh his recollection, but he subsequently wrote to me affirming that he had no independent recollection of the trial other than "its very broad outline."

1 5. We have conducted legal research, traveled to conduct interviews, and prepared the
2 instant petition. We have retained the experts, except Dr. Cassidy, who has consulted
3 with us on a purely *pro bono* basis.

4 6. Mr. Pohlschneider wishes for NCIP to be appointed on his behalf and we ask the Court to
5 do so.

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

8 Executed on April 27, 2015, at Santa Clara, California.
9

10 
11 _____
12 MAITREYA BADAMI