

JULIA A. OLSON (OR Bar 062230)
JuliaAOlson@gmail.com
Wild Earth Advocates
1216 Lincoln Street
Eugene, OR 97401
Tel: (415) 786-4825

ANDREA K. RODGERS (OR Bar 041029)
Andrearodgers42@gmail.com
Law Offices of Andrea K. Rodgers
3026 NW Esplanade
Seattle, WA 98117
Tel: (206) 696-2851

PHILIP L. GREGORY (*pro hac vice*)
pgregory@gregorylawgroup.com
Gregory Law Group
1250 Godetia Drive
Redwood City, CA 94062
Tel: (650) 278-2957

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

KELSEY CASCADIA ROSE JULIANA;
XIUHTEZCATL TONATIUH M., through his
Guardian Tamara Roske-Martinez; et al.,

Plaintiffs,

v.

The UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

Case No.: 6:15-cv-01517-TC

**DECLARATION OF DR. MARK
JACOBSON in Support of Plaintiffs'
Response in Opposition to Defendants'
Motion for Summary Judgment**

**Declaration of Dr. Mark Jacobson in Support of Plaintiffs' Response in
Opposition to Defendants' Motion for Summary Judgment**

I, Dr. Mark Jacobson, hereby declare and if called upon would testify as follows:

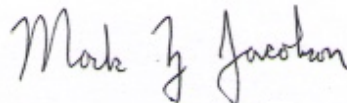
1. I have been retained as an expert on behalf of Plaintiffs in this matter.
2. I have prepared an expert report for this litigation (“Expert Report”), a true and correct copy of which is attached hereto as **Exhibit 1**. My Expert Report is signed by me. A copy of my Expert Report was served on Defendants on April 13, 2018.
 - a. Attached as **Exhibit 2** to this Declaration are Exhibits E through H to my Expert Report, the central papers discussed within my Expert Report.
3. Since my Expert Report was finalized, two independent, peer-reviewed studies have been published that support my expert opinion that countries, including the United States, can transition feasibly and economically to 100% renewable energy by mid-century. The first paper is, *The feasibility of 100% renewable electricity systems: A response to critics*, by Mark Diesendorf and Ben Ellison, published in *Renewable and Sustainable Energy Reviews*, 93, 318-330 (2018), true and correct copy of which is attached hereto as **Exhibit 3**. The second paper is, *Response to ‘Burden of proof: A comprehensive review of the feasibility of 100% renewable-electricity systems,’* by T.W. Brown, T. Bischof-Niemz, K. Blok, C. Breyer, H. Lund, and B.V. Mathiesen, published in *Renewable and Sustainable Energy Reviews*, 92, 834-847 (2018), a true and correct copy of which is attached hereto as **Exhibit 4**.
4. One of the papers, Diesendorf and Elliston, stated: “We find that the principal barriers to 100[% renewable electricity] are neither technological nor economic, but instead are primarily political, institutional and cultural.”
5. My Expert Report contains:

- a. a complete statement of all opinions I will express at trial and the basis and reasons for these opinions;
 - b. the facts or data considered by me in forming my opinions;
 - c. any exhibits that I currently plan to use to summarize or support my opinions;
 - d. my qualifications, including a list of all publications authored by me in the previous 10 years;
 - e. a list of all other cases in which, during the previous 4 years, I testified as an expert at trial or by deposition, if any; and
 - f. a statement of the compensation to be paid for the study and testimony in the case.
6. If called to testify in this matter, I would provide testimony as described in the attached Expert Report.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 25th day of June, 2018.

Respectfully submitted,



Dr. Mark Jacobson