

DECLARATION OF DAVID RAYMOND MUGRIDGE

I, David Raymond Mugridge, declare as follows:

1. I am an attorney in good standing and licensed to practice in the state of California. My law practice is in Fresno, California, where I have litigated numerous homicides including those involving the death penalty. I am a state bar certified criminal law specialist. Most of my time involves special circumstance cases which I have receive by courts appointment. I have been a trial lawyer for approximately 30 years. I am an attorney in private practice, limited exclusively to criminal defense—trials and appellate work.
2. During my years practicing law in Fresno County, I became familiar with Rudy Petilla, now deceased, who represented Keith Zon Doolin on capital murder charges in 1996. Rudy had a poor reputation in the Fresno legal community. I was shocked to learn that he was appointed as counsel in the Doolin case.
3. Recently I was contacted by attorneys Pamala Sayasane and Robert R. Bryan, new state and federal habeas counsel for Mr. Doolin. They asked me about what I knew regarding Rudy and his representation of Mr. Doolin.
4. I related to them that I have exonerating information regarding Mr. Doolin which came to my attention during my representation of Josefina Sonia Saldana, aka Josefina Sonya Hernandez. I represented during her 2001 murder trial for killing Margarita Flores and her baby. Shortly after being convicted, Ms. Saldana committed suicide in the Fresno County Jail by hanging. I recall that she had lived at 2369 South Grace Street, Fresno, at the time of her arrest.

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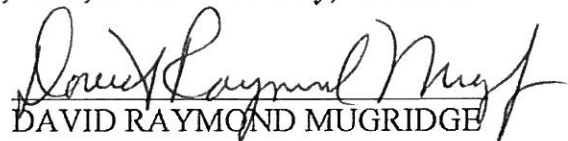
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5. I explained to Ms. Sayasane and Mr. Bryan that I had potentially exonerating information regarding Mr. Doolin. However, it was explained that I am bound by the attorney-client privilege from disclosing how I came upon this information or the nature of the evidence.
6. I told the attorneys that I would gladly tell them what I know, and even provide them with access to the materials in my possession, if a court directed me to do so.
7. I have struggled about what to do with this predicament. As an attorney who has practiced for many years, I strongly believe in the rule of law. However, I also believe in doing what is right, and that includes doing whatever I can to ensure that an innocent man is not wrongfully executed. I agreed to provide Mr. Doolin's counsel with this declaration so that they could preserve their client's right and alert the court to this matter.

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

Executed on this the 4th day of February, 2016, in Fresno County, California.


DAVID RAYMOND MUGRIDGE

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