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5 Attorneys for Defendant William D. Gore

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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
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11 EDWARD PERUTA, MICHELLE
LAXSON, JAMES DODD, DR. LESLIE
12 BUNCHER, MARK CLEARY and
CALIFORNIA RIFLE AND PISTOL
13 ASSOCIATION FOUNDATION,

14 Plaintiffs,

15 v.

16 COUNTY OF SAN DIEGO, WILLIAM D.
GORE, INDIVIDUALLY AND IN HIS
17 CAPACITY AS SHERIFF,

18 Defendants.
19

USSD No. **09-CV-2371 IEG (BLM)**
DEFENDANT WILLIAM D. GORE'S
EX PARTE MOTION TO FILE
EXHIBITS NOS. 2 THROUGH 15 IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT UNDER
SEAL

Hearing Date; November 1, 2010
Time: 10:30 a.m.
Courtroom: 1
The Honorable Irma E. Gonzalez

20 Defendant William Gore hereby applies to the Court for an Order allowing
21 Defendant to file the following exhibits under seal in support of his motion for
22 summary judgment as provided in the Court's Protective Order dated July 14, 2010.

23 The reason for sealing the exhibits is that Defendant's Exhibits 2 through 15 are
24 confidential documents subject to the Protective Order that were provided to Defendant
25 by applicants for concealed weapons licenses, and the documents contain personal
26 information relating to individual applicants which Defendant is bound to keep
27 confidential.

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1 It is therefore requested that an Order be entered sealing the exhibits for all
2 purposes in this action.

3 DATED: October 4, 2010

JOHN J. SANSONE, County Counsel

4 By: s/ James M. Chapin
5 JAMES M. CHAPIN, Senior Deputy
6 Attorneys for Defendant William D. Gore
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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 EDWARD PERUTA, MICHELLE
LAXSON, JAMES DODD, DR. LESLIE
12 BUNCHEER, MARK CLEARY and
CALIFORNIA RIFLE AND PISTOL
13 ASSOCIATION FOUNDATION,

14 Plaintiffs,

15 v.

16 COUNTY OF SAN DIEGO, WILLIAM D.
GORE, INDIVIDUALLY AND IN HIS
17 CAPACITY AS SHERIFF,

18 Defendants.

USSD No. **09-CV-2371 IEG (BLM)**
DECLARATION OF JAMES M. CHAPIN IN SUPPORT OF EX PARTE MOTION TO FILE EXHIBITS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT UNDER SEAL

Hearing Date; November 1, 2010
Time: 10:30 a.m.
Courtroom: 1
The Honorable Irma E. Gonzalez

19 I, JAMES M. CHAPIN, declare:

20 1. I am attorney of record for Defendant in this action.

21 2. Defendant's Exhibits 2 through 15 are confidential documents provided to
22 Defendant by applicants for concealed weapons permits and are specifically the subject
23 of the Protective Order entered by the Court. The documents contain personal
24 information which the applicants expect will remain confidential and which Defendant
25 is bound to protect. The release of such information would invade the privacy rights of

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1 the applicants. It is therefore requested that Exhibits 2 through 15 be sealed for all
2 purposes in this action and that an appropriate Order be entered in that regard.

3 I declare under penalty of perjury that the foregoing is true and correct. I further
4 declare that this declaration is executed this 4th day of October 2010 at San Diego,
5 California.

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7 A handwritten signature in cursive script, appearing to read "James M. Chapin", is written over a horizontal line. The signature is fluid and extends to the right of the line.
8 JAMES M. CHAPIN
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Declaration of Service

I, the undersigned, declare:

I, the undersigned, declare under penalty of perjury that I am over the age of eighteen years and not a party to the case; I am employed in, or am a resident of, the County of San Diego, California, where the service occurred; and my business address is: 1600 Pacific Highway, Room 355, San Diego, California.

On October 4, 2010, I served the following documents: 1. DEFENDANT WILLIAM D. GORE'S EX PARTE MOTION TO FILE EXHIBITS NOS. 2 THROUGH 15 IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT UNDER SEAL; 2. DECLARATION OF CHAPIN IN SUPPORT OF EX PARTE MOTION TO FILE EXHIBIT NOS. 2 THROUGH 15 UNDER SEAL in the following manner:

By placing a copy in a separate envelope, with postage fully prepaid, for each addressee named below and depositing each in the U. S. Mail at San Diego, California.

By electronic filing, I served each of the above referenced documents by E-filing, in accordance with the rules governing the electronic filing of documents in the United States District Court for the Southern District of California, as to the following parties:

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(co-counsel for Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 4, 2010, at San Diego, California.

By: s/ James M. Chapin
JAMES M. CHAPIN, Senior Deputy
E-mail: james.chapin@sdcounty.ca.gov