

1 XAVIER BECERRA  
 Attorney General of California  
 2 STEPAN A. HAYTAYAN  
 Supervising Deputy Attorney General  
 3 JONATHAN M. EISENBERG  
 Deputy Attorney General  
 4 P. PATTY LI  
 Deputy Attorney General  
 5 State Bar No. 266937  
 455 Golden Gate Avenue, Suite 11000  
 6 San Francisco, CA 94102-7004  
 Telephone: (415) 703-1577  
 7 Fax: (415) 703-1234  
 E-mail: Patty.Li@doj.ca.gov  
 8 *Attorneys for Defendant Xavier Becerra, Attorney  
 General of the State of California*

9  
 10 **IN THE UNITED STATES DISTRICT COURT**  
 11 **CENTRAL DISTRICT OF CALIFORNIA**  
 12 **WESTERN DIVISION**

13 **MICHELLE FLANAGAN, et al.,**  
 14 **Plaintiffs,**  
 15 **v.**  
 16 **CALIFORNIA ATTORNEY**  
 17 **GENERAL XAVIER BECERRA, in**  
 18 **his official capacity as Attorney**  
 19 **General of the State of California, et**  
 20 **al.,**  
 21 **Defendants.**

Case No.: 2:16-cv-06164-JAK-AS

**DECLARATION OF P. PATTY LI  
 IN SUPPORT OF DEFENDANT'S  
 MOTION FOR SUMMARY  
 JUDGMENT**

Date: November 6, 2017  
 Time: 8:30 a.m.  
 Courtroom: 10B  
 Judge: Hon. John A. Kronstadt  
 Action Filed: August 17, 2016

1 I, P. Patty Li, declare as follows:

2 1. I am a Deputy Attorney General in the California Attorney General's  
3 Office. I represent Defendant Xavier Becerra, in his official capacity as Attorney  
4 General of California ("Defendant"), in the above-captioned matter. I have  
5 personal knowledge of each fact stated in this declaration, and if called as a witness  
6 I could and would testify competently to them under oath.

7 2. On April 26, 2017, counsel for Defendant deposed Plaintiff Michelle  
8 Flanagan. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from  
9 the transcript of Ms. Flanagan's deposition.

10 3. On April 26, 2017, counsel for Defendant deposed Plaintiff Dominic  
11 Nardone. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from  
12 the transcript of Mr. Nardone's deposition.

13 4. On May 1, 2017, counsel for Defendant deposed Plaintiff Samuel  
14 Golden. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from  
15 the transcript of Mr. Golden's deposition.

16 5. On July 12, 2017, counsel for Plaintiffs deposed Defendant's expert  
17 witness, Stanford Law Prof. John J. Donohue III. Attached hereto as Exhibit 4 is a  
18 true and correct copy of excerpts from the transcript of Prof. Donohue's July 12,  
19 2017 deposition.

20 6. On August 8, 2017, counsel for Plaintiffs deposed Prof. Donohue again.  
21 Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the  
22 transcript of Prof. Donohue's August 8, 2017 deposition.

23 7. On July 27, 2017, counsel for Plaintiffs deposed Defendant's expert  
24 witness, former Covina Chief of Police Kim Raney. Attached hereto as Exhibit 6 is  
25 a true and correct copy of excerpts from the transcript of Chief Raney's deposition.

26 8. On June 1, 2017, Defendant provided to Plaintiffs the expert report of  
27 Prof. Donohue. Two exhibits were appended to Prof. Donohue's expert report: (1)  
28 Prof. Donohue's curriculum vitae and (2) Prof. Donohue's (and two co-authors')

1 academic study, National Bureau of Economic Research, Inc., Working Paper  
2 Series, Working Paper w23510, "Right-to-Carry Laws and Violent Crime: A  
3 Comprehensive Assessment Using Panel Data and State-Level Synthetic Controls  
4 Analysis" (the "Donohue Study"), dated May 23, 2017. Attached hereto as Exhibit  
5 7 is a true and correct copy of Prof. Donohue's expert report and curriculum vitae,  
6 as appended to Prof. Donohue's expert report. Attached hereto as Exhibit 8 is a  
7 true and correct copy of the Donohue Study, as appended to Prof. Donohue's expert  
8 report.

9 9. On July 21, 2017, Defendant provided to Plaintiffs an updated version of  
10 the Donohue Study, dated June 2017. Attached hereto as Exhibit 9 is a true and  
11 correct copy of the updated Donohue Study.

12 10. On June 1, 2017, Defendant provided to Plaintiffs the expert report of  
13 Chief Raney. Attached hereto as Exhibit 10 is a true and correct copy of Chief  
14 Raney's expert report.

15 11. Attached hereto as Exhibit 11 is a true and correct copy of "Easiness of  
16 Legal Access to Concealed Firearms Permits and Homicide Rates in the US  
17 States," by Boston University Prof. of Public Health Michael Siegel, et al., an  
18 officially unpublished article in press with and under embargo until publication by  
19 the American Journal of Public Health.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on September 11, 2017, at San Francisco, California.

22 

23 \_\_\_\_\_  
24 P. Patty Li

25  
26  
27  
28