

SEILER EPSTEIN ZIEGLER & APPEGATE LLP
Attorneys at Law

1 George M. Lee (SBN 172982)
Douglas A. Applegate (SBN 142000)
2 **SEILER EPSTEIN ZIEGLER & APPEGATE LLP**
601 Montgomery Street, Suite 2000
3 San Francisco, California 94111
Phone: (415) 979-0500
4 Fax: (415) 979-0511

5 Raymond M. DiGuseppe (SBN 228457)
LAW OFFICES OF RAYMOND MARK DIGUISEPPE, PLLC
6 4002 Executive Park Blvd., Suite 600
Southport, NC 28461
7 Phone: (910) 713-8804
Fax: (910) 672-7705

8 Attorneys for Plaintiffs
9 WILLIAM WIESE, JEREMIAH MORRIS,
LANCE COWLEY, SHERMAN MACASTON,
10 ADAM RICHARDS, CLIFFORD FLORES,
L.Q. DANG, FRANK FEDEREAU, ALAN NORMANDY,
11 TODD NIELSEN, THE CALGUNS FOUNDATION,
FIREARMS POLICY COALITION,
12 FIREARMS POLICY FOUNDATION,
and SECOND AMENDMENT FOUNDATION

13 UNITED STATES DISTRICT COURT

14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 WILLIAM WIESE, et al.,

16 Plaintiffs,

17 vs.

18 XAVIER BECERRA, in his official capacity as
19 Attorney General of California, et al.,

20 Defendants.

Case No. 2:17-cv-00903-WBS-KJN

**SUPPLEMENTAL DECLARATION OF
GEORGE M. LEE IN SUPPORT OF
PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND ISSUANCE OF
PRELIMINARY INJUNCTION**

[FRCP 65; E.D. L.R. 231]

Date: TBD
Time: TBD
Courtroom 5
Judge: Hon. William B. Shubb

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DECLARATION OF GEORGE M. LEE

I, George M. Lee, declare as follows:

1. I am an attorney at law, in good standing, duly licensed to practice law in this state and appear before its courts. I am admitted to the U.S. District Court, Eastern District of California. I am a partner with Seiler Epstein Ziegler & Applegate LLP, attorneys of record for Plaintiffs in the above-entitled action. I have personal knowledge of the facts stated in this declaration, and if called as a witness, could competently testify thereto.

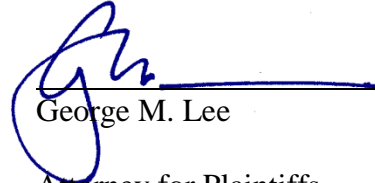
2. This supplemental declaration is submitted to inform the court of a pending matter in another court, hearing of which is scheduled today (June 13) at 10:00 a.m., wherein the plaintiffs in that matter are seeking substantially similar relief as that set forth in the motion we filed yesterday. See: *Duncan v. Becerra*, U.S. District Court for the Southern District of California, Case No. 17-cv-1017-BEN-JLB, Hon. Roger T. Benitez, presiding, filed 5/17/17. I am informed and believe that Deputy Attorney Gen. Alexandra Robert Gordon is also representing the defendants in that matter. The plaintiffs are different in that matter, of course, and the arguments and theories advanced are not identical.

3. As stated in my original declaration (Docket #21), immediate temporary injunctive relief is requested to enjoin enforcement of the relevant laws that are the subject of the motion, which go into effect on July 1, 2017. Accordingly, we have requested immediate temporary injunctive relief, and the scheduling of a hearing on Plaintiffs' motion for a preliminary injunction. (See Proposed TRO and Order Scheduling Hearing (Docket #23)). Alternatively, we would request a hearing on the combined TRO/PI motion before July 1. However, if complete relief is granted to the plaintiffs today in the Duncan matter, it may determine when and/or whether the instant motion should be scheduled. I will continue to meet and confer with Ms. Gordon on these matters.

4. A true and correct copy of my letter sent to the court, via its Courtroom Deputy, is attached hereto as **Exhibit A**.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 June 13, 2017, at San Francisco, California.

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George M. Lee
5 Attorney for Plaintiffs
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SEILER EPSTEIN ZIEGLER & APPEGATE LLP
Attorneys at Law

CERTIFICATE OF SERVICE - ECF

I declare that I am over the age of eighteen years and that I am not a party to the above action. My business address is 601 Montgomery Street, Suite 2000, San Francisco, California 94111.

I hereby certify that on this date, I electronically filed the foregoing document(s) with the U.S. District Court Clerk's Office by using this District's CM/ECF Filing System, which will send a Notice of Electronic Filing to the parties below.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished to them via the CM/ECF system, who are as follows:

Alexandra Robert Gordon
CA. Dept. of Justice
Office of the Attorney General
455 Golden Gate Ave., Ste. 11000
San Francisco, CA 94102
415-703-5509
415-703-1234 (fax)
alexandra.robertgordon@doj.ca.gov

I declare under penalty of perjury that the foregoing is true and correct. Executed June 13, 2017, at San Francisco, California.

/s/ George M. Lee
GEORGE M. LEE

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**SEILER
EPSTEIN
ZIEGLER &
APPLEGATE LLP**

Attorneys at Law

GML@SEZALAW.COM

June 13, 2017

*Via Federal Express
and Email*

Hon. William B. Shubb
c/o Karen Kirksey Smith <KKirkseySmith@caed.uscourts.gov>
U.S. DISTRICT COURT – EASTERN DISTRICT OF CALIFORNIA
501 I Street, Courtroom 5, 14th Floor
Sacramento, CA 95814

Re: *Wiese v. Becerra, et al.*
Case No. 2:17-cv-00903-WBS-KJN

Dear Judge Shubb:

Pursuant to Local Rule 133(f), enclosed please find courtesy copies of the motion and supporting papers that were filed yesterday in the above-reference matter.

As stated in my supporting declaration (Docket #21), immediate temporary injunctive relief is requested to enjoin enforcement of the relevant laws that are the subject of the motion, which go into effect on July 1, 2017. Prior to filing the motion, I attempted to meet and confer with Dep. Attorney General Alexandra Robert Gordon, to request stipulation to a joint request to have the matter heard before July 1, and to stipulate to a briefing schedule that would allow the matter to be heard on a shortened-time basis. (Dec., ¶ 5.) Unfortunately, due to her conflicting schedule, she was unable to accommodate this request. (Id.)

Accordingly, the motion for a TRO requests immediate relief, and the scheduling of a hearing on Plaintiffs' motion for a preliminary injunction. See Proposed TRO and Order Scheduling Hearing (Docket #23). Alternatively, we would request a hearing on the combined TRO/PI motion before July 1.

We should also advise the court that a hearing is being held today in another court, wherein the plaintiffs in that matter are seeking substantially similar relief as that set forth in the motion we filed yesterday: *Duncan v. Becerra*, U.S. District Court for the Southern District of California, Case No. 17-cv-1017-BEN-JLB, Hon. Roger T. Benitez, presiding. I believe that Ms. Gordon is also representing the defendants in that matter. If relief is granted in that matter, that may render the instant motion moot.

SEZA

Attorneys at Law
Page 2

We thank the court for its consideration and attention to this matter. If the court wishes to schedule a joint conference with all counsel, please let us know. Counsel for defendants is copied here, of course.

Very truly yours,



George M. Lee

Enclosures

cc: Dep. Attorney General Alexandra Robert Gordon (via email)
Raymond M. DiGiuseppe (via email)