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9 *State of California, Edmund G. Brown Jr., and the*
California Department of Justice

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF FRESNO

14 **SHERIFF CLAY PARKER, et al.,**

15 Plaintiffs and Petitioners,

16 v.

18 **THE STATE OF CALIFORNIA, et al.,**

19 Defendants and
20 Respondents.

Case No. 10CECG02116

**DECLARATION OF BLAKE GRAHAM
IN SUPPORT OF THE STATE'S
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE, SUMMARY
ADJUDICATION / TRIAL BRIEF**

Date: January 18, 2011
Time: 8:30 a.m.
Dept.: Dept. 402
Judge: Hon. Jeffrey Hamilton

Trial Date: January 18, 2011
Action filed: June 17, 2010

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1 to identify ammunition and firearms for sale at the gun shows as part of these duties. As
2 part of my normal duties I also had to maintain proficiency with Department issued
3 handguns and long guns. During this time I learned what cartridges fit into my own
4 issued firearms and other Department issued firearms not specifically assigned to me. At
5 the time, I carried a Glock, Model 23, .40 caliber semi automatic pistol and a Heckler &
6 Koch, MP5 9mm submachine. At the gun shows, I reviewed different rifles and handguns
7 and ammunition and often would be involved in the seizure of guns and ammunition from
8 felons, parolees, and probationers.

9 5. From October 2002 to the present, I have been a Special Agent and Special
10 Agent Supervisor, for the DOJ's Bureau of Firearms (BOF). In my career I have attended
11 at least forty gun shows and have become very knowledgeable on current laws pertaining
12 to the sales of firearms in the State of California. The California DOJ BOF also maintains
13 the State's Assault Weapon Registry. If a person with registered assault weapons or other
14 firearms becomes prohibited from possessing firearms I am assigned to recover the
15 firearms. I also investigate prohibited people in possession of firearms, illegal trafficking
16 of firearms, manufacturing of assault weapons, machine guns, and illegal possession of
17 ammunition. I also investigate gun dealers suspected of illegal activities and continue to
18 monitor gun shows for illegal activities. While employed by the DOJ BOF I have carried
19 and qualified with 2 different .45 caliber semi automatic pistols, 2 different Glock .40
20 caliber, semi automatic pistols and a Colt, Model M-4, 5.56 mm machine gun. I have
21 access to other Department owned handguns, shotguns, submachine guns, machine guns,
22 rifles, shotguns and 40 mm "less lethal" launchers. I have trained other Special Agents
23 of DOJ's Bureau of Firearms on assault weapons identification, firearms identification. I
24 also have given firearms identification classes to members of the Sacramento and San
25 Joaquin DA's offices.

26 6. For the last two years, I have assumed responsibility for reviewing handguns
27 that are submitted by manufacturers for inclusion in California's roster of handguns
28 certified for sale. This involves breaking the weapons down into their smaller

1 components, looking at those, comparing them to ones already on the list, and helping to
2 make determinations about whether a handgun should be added to the roster or not. For
3 the weapons that I review as part of this function of my job, I have to identify specific
4 calibers marked on the guns that match the paperwork submitted by the manufacturers,
5 and as such, I gain an understanding of calibers common to handguns in California and I
6 gain an understanding of the calibers and weapons that are being submitted for the DOJ
7 roster. There are currently over 1300 handguns included in the roster. I have access to a
8 sample handgun for each gun on the roster. A true and correct copy of DOJ's current
9 Roster of Handguns Certified for Sale is attached as **Exhibit "H"** to the State's Evidence
10 in Support of its Opposition to Plaintiffs' Motion for Summary Judgment or, In the
11 Alternative, Summary Adjudication ("State's Compendium of Evidence").

12 **Relevant Training Courses**

13 7. During my career, I have completed the following firearms training courses:

14 a. 12/15/1994: I completed a 365 hour Peace Officer Standards and
15 Training (POST) recognized Basic Specialized Investigator Academy at the Yuba
16 Community College in Linda, CA. This included all the normal activities of a police
17 academy except traffic enforcement, including arrest and control, firearms, and legal
18 training. During the shooting range portion of this training, I received instruction on the
19 proper calibers and cartridges to use in various handguns and long guns.

20 b. 3/16/2000: I completed a 32 hour class in "Entry Weapons" taught by the
21 California Department of Justice, Advanced Training Center. At the time, I carried a
22 Heckler and Koch MP5 submachine gun which chambered a 9mm Luger pistol cartridge,
23 but I received training on other weapons including the Colt M4 and Bushmaster M4
24 variants chambered in .223 and 5.56 mm. During this course, part of the training involved
25 using a pistol when our machine guns had a malfunction.

26 c. 3/19/2000: I completed an 80 hour class in Advanced Tactical
27 Operations, Less Lethal Munitions & Chemical Agent Certification taught by the
28 California Department Of Justice, Advanced Training Center.

1 d. 1/20/2002: I completed a 24 hour class in Assault Rifle training, taught
2 by the California Department of Justice, Advanced Training Center. This training
3 included long range firing of a Colt M4 machine guns chambered in 5.56 mm and .223
4 caliber.

5 e. 11/08/2002: I completed a 40 hour California Peace Officer Standards
6 and Training (POST) approved Firearms Instructor/Rangemaster School. This included
7 training to become a range master and instruct others in the proper and safe use of
8 firearms, nomenclature regarding various weapons, shooting, how to set up classes and
9 how to instruct others. In this course I dealt with handguns, rifles, and shotguns. The
10 manual for this class dealt with cartridge composition, meaning the bullet itself, the
11 propellant, and the casing. We also covered common calibers that are used by law
12 enforcement, including the benefits of certain calibers over others. I also received training
13 on what rifle ammunition was and what handgun ammunition was. I was certified as a
14 Range Master after this training.

15 f. 9/18/2003: I completed a 24 hour class on Heckler & Koch MP5 trigger
16 groups and USP pistols. This class was taught by Heckler & Koch International Training
17 Division. This training course dealt with the repair, identification and some
18 modifications on the MP5 submachine gun trigger groups. A portion of the class dealt
19 with variants of the USP pistol produced by Heckler & Koch. I learned that the MP5 was
20 predominantly a 9mm submachine gun, but that 10mm and .40 caliber variants existed.

21 g. 5/14/2004: I attended an 8 hour ATF sponsored training class on the AK-
22 47 and SKS. This class consisted of both classroom and shooting range based training in
23 Dublin, California. It was taught by ATF special agents on the AK-47 machine gun, the
24 semiautomatic versions of that weapon and then the SKS rifle and some of the variants.
25 The AK-47 and the SKS predominantly are chambered in 7.62x39mm caliber
26 ammunition.

27 h. 9/13/2004: I was part of a DOJ BOF ballistic testing exercise conducted
28 in Grass Valley, CA. The substances used were ballistic gelatin and 2 car doors. The

1 purpose was to determine what certain rounds of ammunition would do upon impacting
2 ballistic gelatin and automobiles; including fragmentation and penetration depth.

3 i. 5/10/2005 & 5/11/2005: I attended and completed a 16 hour Armalite
4 AR-15 rifle armorer's course in Folsom, CA. This class was taught by trainers from
5 Armalite Corporation. This course instructed me how to disassemble an AR-15 style rifle,
6 put it back together, identify problems with the weapon system, including malfunctions
7 that may occur, how to clean them, and what ammunition is appropriate for use in AR-15
8 and AR-10 style rifles.

9 j. 3/16/2006: I completed a 16 hour Colt 1911 pistol armorers school in
10 Sunnyvale, CA. This course covered some of the different models that the .45 caliber
11 1911 comes in. We were instructed on how to identify problems with the weapon; make
12 repairs; make modifications, if necessary; disassembling and reassembling the weapon.

13 k. 5/11/2006: I completed a 24 hour Firearms/Rifle Instructor update class
14 in Ione, CA. This was refresher course for my Range Master training.

15 l. 7/27/2006: I co-taught a firearms identification class at the Sacramento
16 District Attorney's Office. This class was attended by Deputy District Attorneys and
17 District Attorney Investigators. The class covered firearms nomenclature, general
18 firearms, rifles, pistols, shotguns, and assault weapons. We gave some general
19 information on the weapons we had present in class. We also had sample weapons that we
20 passed around the room for them to handle as well as ammunition. This was to help the
21 attorneys understand what they might read about in the police reports that they saw.

22 m. 8/4/2006: I conducted follow up training with the Sacramento District
23 Attorney's Office staff. This class was at the California Highway Patrol Academy in
24 West Sacramento. The Attorney's and District Attorney Investigators were able to handle
25 and fire revolvers, semi automatic pistols, rifles, shotguns.

26 n. 1/17/2007: I attended a 4 hour class on the AK-47 assault rifle and the
27 MP-40 submachine gun. This was given by DOJ BOF SAS Ignatius Chinn. This
28

1 included classroom training and shooting with each type of firearm. The MP-40 was
2 chambered for a 9mm Luger cartridge.

3 o. 3/28/2007: I received training on the Tec 9 assault pistol and the SKS
4 rifle. This class was given by DOJ BOF Special Agents Matt Badgley and Jeff Aleman in
5 Newhall, California. The TEC-9 was a 9mm and the SKS rifle was 7.62x39mm caliber.

6 p. 12/16/2008: I completed an 8 hour Armorer's class on Glock pistols.
7 This class was held at the Galt Police Department. Through this class I came to better
8 understand the Glock pistol and its variants. I was taught how to disassemble and repair
9 the Glock. This course covered the many varieties of the Glock pistols sold currently.

10 8. During the course of my career and training I have become proficient in the use
11 and disassembly of various revolvers, pistols, submachine guns, shotguns, and rifles. I
12 have made or assisted in the arrest of at least thirty persons for violations involving illegal
13 weapons possession. In the course of my employment I have participated in an excess of
14 thirty search warrants which involved the illegal possession of firearms.

15 **Prior Expert Witness Testimony**

16 9. I have qualified as an expert witness in the following court cases:

17 a. On 02/15/2007, I qualified as an expert witness on Assault Weapons
18 identification, Assault Weapons registration, and the DOJ Automated Firearms System.
19 This was in Santa Clara County Superior Court in a preliminary hearing.

20 b. On 04/12/2007, I qualified as an expert witness on Assault Weapons
21 identification, Assault Weapons registration, and the DOJ Automated Firearms System in
22 the Santa Clara County Superior Court in a preliminary hearing.

23 c. On 06/09/2008, I qualified as an expert witness on Assault Weapons
24 identification and Assault Weapons registration. This was in Placer County Superior
25 Court during a preliminary hearing.

26 d. On 05/04/2009, I qualified as an expert witness on Assault Weapons
27 identification and Assault Weapons registration. This was in Placer County Superior
28 Court during a jury trial.

1 e. On 10/27/2010, I qualified as an expert witness on Assault Weapons
2 identification and Assault Weapons registration. This was in Placer County Superior
3 Court during a preliminary hearing.

4 f. On 11/04/2010, I qualified as an expert witness on Assault Weapons
5 identification. This was in San Mateo County Superior Court during a preliminary
6 hearing.

7 **Work on this Case**

8 10. In the course of my career, and in forming the opinions that I have and will
9 render in this case, I have read and consulted treatises that include Cartridges of the
10 World, Rifles of the World, Gun Traders Guide, and various firearms-related websites,
11 including those of firearms manufacturers like Winchester, Ruger, Heckler & Koch, and
12 Glock, as well as the Sporting Arms and Ammunition Manufacturers Institute (SAAMI)
13 website. SAAMI is an association of the nation's leading manufacturers of firearms,
14 ammunition and components. It creates and publishes industry standards for safety,
15 interchangeability, reliability and quality. Attached as **Exhibit "G"** to the State's
16 Compendium of Evidence is a true and correct copy of excerpts from the SAAMI
17 publication entitled *Voluntary Industry Performance Standards for Pressure and Velocity*
18 *of Centerfire Pistol and Revolver Ammunition for the Use of Commercial Manufacturers*.
19 This document was produced to the plaintiffs in this case before my deposition and I
20 relied upon it to help determine whether the cartridges identified in paragraph 12 below
21 are used principally in handguns. Each of the listed cartridges (except 10mm Auto which
22 was not being manufactured when the Performance Standards were published) are
23 identified as pistol and revolver ammunition by this respected manufacturer's trade group.

24 11. For background information on sales and how various calibers and cartridges
25 of ammunition are marketed for sale, I also reviewed ammunition vendor websites
26 including Cheaper Than Dirt, Cabela's, J&G Sales, and Midway USA. To expand my
27 knowledge base, I continually review new and different ammunition and firearms because
28 of the job that I hold at DOJ.

1 12. Based upon the foregoing training, research, and experience and the expertise
2 derived therefrom, I was asked to identify calibers and cartridges of ammunition that are
3 principally for use in pistols, revolvers, and other firearms capable of being concealed
4 upon the person, notwithstanding that the ammunition may also be used in some rifles. I
5 interpreted and applied this standard to mean ammunition that is chambered, or loaded,
6 more frequently in handguns than in rifles. The list I compiled included handgun
7 cartridges in the following calibers: .45, 9mm, 10mm, .40, .357, .38, .44, .380, .454, .25,
8 and .32. Within these general calibers, I have identified the following cartridges as
9 handgun ammunition within the meaning of the statutes challenged in this case:

- 10 a. .45 Automatic Colt Pistol (aka 45 ACP, 45 Auto, 45 Automatic +P)
- 11 b. .45 Glock Auto Pistol (45 GAP)
- 12 c. 9mm Luger (aka 9x19 mm, 9mm Parabellum, 9mm Luger +P)
- 13 d. 10mm Automatic
- 14 e. 40 S&W Automatic
- 15 f. .357 Magnum (aka 357 Smith & Wesson Magnum)
- 16 g. .357 SIG
- 17 h. .38 Special (aka 38 Special +P, 38 Smith & Wesson Special, 38 Colt Special)
- 18 i. .38 Super (aka 38 Super automatic, 38 Super Automatic +P)
- 19 j. .44 Remington Magnum (44 Magnum)
- 20 k. .44 Smith & Wesson Special
- 21 l. .44 Auto Mag
- 22 m. .380 Automatic Colt Pistol (aka 380 ACP, 380 Auto, 9mm Kurz, 9 x 17 mm)
- 23 n. .454 Casull
- 24 o. .25 Automatic Colt Pistol (aka 25 ACP, 25 Auto)
- 25 p. .32 Automatic Colt Pistol (aka 32 ACP, 32 Auto)

26 13. The starting point for my analysis was the DOJ's Dealer Record of Sale
27 (DROS) and Automated Firearm System databases, which contain information on all
28 handguns purchased or transferred in California each year. Specifically, I asked an

1 analyst to run a report for me from those databases that reflected how many handguns in
2 each particular caliber were sold over the last five years. The report that was generated
3 was used as a starting point to show which handgun calibers have been most common in
4 terms of handgun sales over the past several years. My experience and expertise was then
5 applied to the list to narrow the list of calibers down to those cartridges that are principally
6 used in pistols and revolvers. The list of handgun ammunition calibers and cartridges that
7 appears in the State's Response to Plaintiffs' Special Interrogatory No. 5 (and in
8 paragraph 12 above) is primarily the result of my work and analysis.

9 14. I was careful to consider during my analysis any calibers and cartridges of
10 ammunition that were clouded by "dual use" issues, meaning that the ammunition might
11 be used just as often in handguns as rifles. For instance, .22 caliber ammunition was left
12 off of this list at this time because, without further research and analysis, it was not
13 possible in the time available to determine whether .22 caliber ammunition is used
14 principally in handguns or in rifles. The same is true of certain other calibers.

15 **Rifles and Long Guns Chambered in Pistol Calibers Were Considered**

16 15. As part of my research into ammunition that is used principally in handguns, I
17 considered how many models of rifles, machine guns, submachine guns and other long
18 guns that chamber the cartridges listed in paragraph 12 I could find. In some instances the
19 non handguns chambered in a "listed" cartridge are illegal for the average California citizen
20 to possess. While there are legally registered assault weapons in California that chamber
21 some of the listed cartridges the handguns that shoot the same cartridge are far more
22 prevalent in my experience. A true and copy of a spreadsheet I prepared showing the
23 results of my research is attached as **Exhibit "J"** to the State's Compendium of Evidence
24 and was provided to the plaintiffs in this case prior to my deposition. Despite several
25 attempts to refer to that document during my deposition, I was never questioned about it.

26 16. My research into long guns that fire the same calibers or cartridges as
27 handguns revealed that very few, and in some cases no, long guns models were available
28 that chambered and fired the handgun calibers I have identified. I have listed those

1 longuns readily apparent to me during the time available. This list is not all inclusive of
2 every long gun ever made. There may be other long guns chambered in a listed cartridge
3 that I am unaware of at this time. The following is a summary of my research into long
4 guns that chamber the calibers or cartridges identified in paragraph 12, above:

5 a. **.45 Automatic Colt Pistol (ACP):** I found the following long guns that
6 chamber a .45 ACP cartridge; (1) the Marlin Camp Carbine, which is a self-loading
7 carbine that was discontinued in 1999; (2) Auto Ordinance Thompson (aka Tommy Gun);
8 (3) Hi-Point Firearms 995, the IMI UZI carbine, and the M3 "grease gun", a submachine
9 gun. Of these long guns only the Marlin is not an assault weapon or submachine gun
10 when in its factory configuration. There are nearly 400 variants of handguns chambered
11 for the .45 ACP cartridge presently for sale in California.

12 b. **9mm (Luger/Parabellum/9x19):** I found the following long guns
13 chambered for the 9mm Luger cartridge. These include: (1) Marlin (camp carbine) (2)
14 Kel Tec (Sub-2000); (3) Ruger (PC-9 carbine); (4) Hi-Point 995; (5) Heckler & Koch
15 MP5/HK94; (6) Heckler & Koch MP5; (7) UZI submachine gun and carbines; (8) the Colt
16 9mm Submachine Gun/carbine, the German MP-38/40 submachine gun. Of the above
17 long guns only the Marlin and Ruger are still legal for sale in California in their factory
18 configurations. The Kel Tec, Hi-Point, Heckler & Koch and UZI carbines are normally
19 assault weapons in their factory configurations. The Heckler & Koch MP5 submachine
20 gun, UZI submachine gun and MP38/40's are not generally in the hands of the California
21 citizenry. There are over 200 9mm handgun variants currently for sale in California and
22 countless others that have been sold over the past ten years.

23 c. **10mm Automatic:** I identified the following long guns that chamber
24 10mm rounds. These firearms are (or were) generally available only to law enforcement
25 and military users because of their assault weapon or machine gun status: (1) Armalon
26 PC carbine; (2) Auto Ordinance Thompson submachine gun; (3) D-Max (carbine); (4)
27 Goncz (GS carbine); (5) Heckler & Koch MP5 submachine gun; (6) Olympic Arms K10;
28

1 (7) LeMag Custom M1 carbine. There are over a dozen of 10mm handgun variants widely
2 available for purchase to civilian users.

3 d. **.40 Smith & Wesson:** I identified five long guns that chamber this
4 cartridge; (1) Beretta CX4 Storm (AW); (2) Kel Tec Sub 2000; (3) Ruger PC-40 Carbine;
5 (4) Hi-Point 995; and (5) Olympic Arms K40-GL. Only the Ruger carbine is legal for
6 sale in California when in its factory configuration. There are more than 150 handguns
7 for sale in California that chamber this cartridge.

8 e. **.357 Magnum/.38 Special:** Although there are over two hundred
9 individual handguns currently for sale in California that chamber these cartridges, which
10 have historically been known as pistol cartridges, there are fewer than ten rifles available
11 that chamber both the .357 Magnum and .38 Special cartridge, including the Winchester
12 Model 1892, the Marlin Model 1894 CSS, and the Harrington and Richardson Handi-
13 Rifle, the Puma Model 92; the Henry Big Boy; and the Marlin Model 1894CP lever
14 action. Some manufacturers even describe these rifles as chambering "pistol calibers."
15 (See www.winchesterguns.com/products/catalog/detail.asp?mid=534162&family=022C.)

16 f. **.357 SIG:** I was unable to find any long guns that chamber this cartridge.

17 g. **.44 Magnum:** I have identified the following long guns that chamber a
18 .44 Magnum cartridge: (1) Henry Repeating Arms Big Boy; (2) Marlin 1894; (3) the
19 Winchester 1892 short; (4) the Harrington and Richardson Handi Rifle; and (5) the Ruger
20 .44 magnum carbine.

21 h. **.380 Automatic Colt Pistol:** I was unable to find any California legal
22 long guns that chamber this cartridge.

23 i. **.454 Casull:** I identified only one rifle that chambers this cartridge, the
24 Puma Lever Action.

25 j. **.25 Automatic Colt Pistol:** I was unable to find any long guns that
26 chamber this cartridge.

27 k. **.32 Automatic Colt Pistol:** I was unable to find any California legal
28 long guns that chamber this cartridge.

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DECLARATION OF SERVICE BY OVERNIGHT COURIER

Case Name: Sheriff Clay Parker, et al. v. The State of California
No.: 10CECG02116

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550.

On January 3, 2011, I served the attached

DEFENDANTS' MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE SUMMARY ADJUDICATION/TRIAL BRIEF

DECLARATION OF KIMBERLY J. GRAHAM IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE SUMMARY ADJUDICATION/TRIAL BRIEF

DECLARATION OF PETER A. KRAUSE IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE SUMMARY ADJUDICATION/TRIAL BRIEF

DECLARATION OF BLAKE GRAHAM IN SUPPORT OF THE STATE'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY ADJUDICATION/TRIAL BRIEF

DEFENDANTS' REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY ADJUDICATION/TRIAL BRIEF; DECLARATION OF PETER A. KRAUSE IN SUPPORT THEREOF

DEFENDANTS' EVIDENCE IN SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE SUMMARY ADJUDICATION/TRIAL BRIEF

(1) DEFENDANTS' RESPONSE TO SEPARATE STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE SUMMARY ADJUDICATION / TRIAL BRIEF; and (2) SUPPLEMENTAL STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION

(1) DEFENDANTS' OBJECTIONS TO EVIDENCE AND DECLARATIONS SUBMITTED IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY ADJUDICATION/TRIAL BRIEF; (2) [PROPOSED] ORDER THEREON

(1) DEFENDANTS' OBJECTIONS TO PLAINTIFFS' REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY ADJUDICATION/TRIAL BRIEF; (2) [PROPOSED] ORDER THEREON

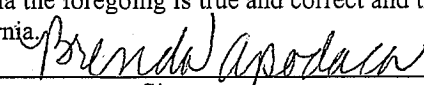
by placing a true copy thereof enclosed in a sealed envelope with the Golden State Overnight courier service, addressed as follows:

C.D. Michel
Clint B. Monfort
Sean A. Brady
Michel & Associates, P.C.
180 E. Ocean Boulevard, Suite 200
Long Beach, CA 90802

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 3, 2011, at Sacramento, California.

Brenda Apodaca

Declarant


Signature