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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 ESPANOLA JACKSON, PAUL COLVIN,) CASE NO. C09-2143-RS
THOMAS BOYER, LARRY BARSETTI,)
12 DAVID GOLDEN, NOEMI MARGARET) **DECLARATION OF ESPANOLA JACKSON**
ROBINSON, NATIONAL RIFLE) **IN SUPPORT OF MOTION FOR PARTIAL**
13 ASSOCIATION OF AMERICA, INC., SAN) **JUDGMENT ON THE PLEADINGS**
FRANCISCO VETERAN POLICE)
14 OFFICERS ASSOCIATION,)

15 Plaintiffs)
)

16 vs.)
)

17 CITY AND COUNTY OF SAN)
FRANCISCO, THE MAYOR OF)
18 SAN FRANCISCO, AND THE CHIEF)
OF THE SAN FRANCISCO POLICE)
19 DEPARTMENT, in their official capacities,)
and DOES 1-10,)

20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)

DECLARATION OF ESPANOLA JACKSON

1
2 1. I, Espanola Jackson, am a plaintiff in the above-entitled action. I make this declaration
3 of my own personal knowledge and, if called as a witness, I could and would testify competently
4 to the truth of the matters set forth herein.

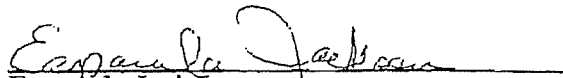
5 2. I reside in the City and County of San Francisco.

6 3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of
7 the United States and the state of California.

8 4. I currently own at least one lawfully acquired and possessed handgun that I keep in my
9 home for self-defense purposes.

10 5. In accordance with San Francisco Police Code section 4512, my handgun is currently
11 stored in a lockbox at all times when not carried on my person. I presently want to store my
12 handgun unlocked and operable for immediate self-defense and, but for section 4512, I would not
13 store my handgun in a locked container at all times. If this court declares section 4512 invalid or
14 otherwise enjoins its enforcement, I would keep my handgun operable within my home, i.e., not
15 disabled by a trigger lock or stored in a locked container.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed within the
17 United States on May 2, 2012.

18 
19 Espanola Jackson

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 ESPANOLA JACKSON, PAUL COLVIN,) CASE NO.: CV-09-2143-RS
5 THOMAS BOYER, LARRY BARSETTI,)
6 DAVID GOLDEN, NOEMI MARGARET)
7 ROBINSON, NATIONAL RIFLE) CERTIFICATE OF SERVICE
8 ASSOCIATION OF AMERICA, INC., SAN)
9 FRANCISCO VETERAN POLICE)
10 OFFICERS ASSOCIATION,)

11 Plaintiffs)

12 vs.)

13 CITY AND COUNTY OF SAN)
14 FRANCISCO, THE MAYOR OF)
15 SAN FRANCISCO, AND THE CHIEF)
16 OF THE SAN FRANCISCO POLICE)
17 DEPARTMENT, in their official capacities,)
18 and DOES 1-10,)

19 Defendants.)

20 IT IS HEREBY CERTIFIED THAT:

21 I, the undersigned, am a citizen of the United States and am at least eighteen years of age.
22 My business address is 180 E. Ocean Blvd., Suite 200, Long Beach, California, 90802.

23 I am not a party to the above-entitled action. I have caused service of:

24 **DECLARATION OF ESPANOLA JACKSON IN SUPPORT OF**
25 **MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS**

26 on the following party by electronically filing the foregoing with the Clerk of the District Court
27 using its ECF System, which electronically notifies them.

28 Wayne Snodgrass, Deputy City Attorney
Christine Van Aken, Deputy City Attorney
Office of the City Attorney
1 Drive Carlton B. Goodlett Place
City Hall, Room 234
San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 17, 2012.

/s/ C. D. Michel
C. D. Michel
Attorney for Plaintiffs