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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 NOEMI MARGARET**  
ROBINSON, NATIONAL RIFLE ) **ROBINSON IN SUPPORT OF MOTION FOR**  
13 ASSOCIATION OF AMERICA, INC., SAN ) **PARTIAL JUDGMENT ON THE**  
FRANCISCO VETERAN POLICE ) **PLEADINGS**  
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

**DECLARATION OF NOEMI MARGARET ROBINSON**

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2 1. I, Noemi Margaret Robinson, am a plaintiff in the above-entitled action. I make this  
3 declaration of my own personal knowledge and, if called as a witness, I could and would testify  
4 competently 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  
9 my home for self-defense purposes.

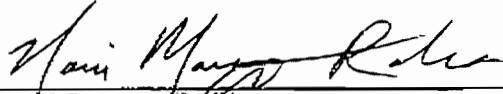
10 5. In accordance with San Francisco Police Code section 4512, my handgun is presently  
11 stored in a locked safe at all times when not carried on my person. I presently want to store my  
12 handgun unlocked and operable for immediate self-defense and, but for section 4512, I would not  
13 store 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 6. But for San Francisco Police Code section 613.10(g), I presently intend to purchase  
17 expanding and fragmenting ammunition in the City and County of San Francisco that is currently  
18 prohibited from sale and purchase under section 613.10(g) for the purpose of self-defense in my  
19 home. If this court declares section 613.10(g) invalid or otherwise enjoins its enforcement, I  
20 would purchase such ammunition within the City and County of San Francisco for self-defense in  
21 my home.

22 7. But for San Francisco Police Code section 613.10(g), I presently intend to purchase  
23 ammunition in the City and County of San Francisco for the purpose of self-defense in my home  
24 regardless of whether such ammunition serves a “sporting purpose” to City’s satisfaction. If this  
25 court declares section 613.10(g) invalid or otherwise enjoins its enforcement, I would purchase  
26 such ammunition within the City and County of San Francisco for self-defense in my home.

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

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4 Noemi Margaret Robinson

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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 )  
SAN FRANCISCO, AND THE CHIEF )  
OF THE SAN FRANCISCO POLICE )  
DEPARTMENT, in their official capacities, )  
and DOES 1-10, )  
Defendants. )

15 IT IS HEREBY CERTIFIED THAT:

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

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

19 **DECLARATION OF NOEMI MARGARET ROBINSON IN SUPPORT OF  
20 MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS**

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

23 Wayne Snodgrass, Deputy City Attorney  
24 Christine Van Aken, Deputy City Attorney  
25 Office of the City Attorney  
26 1 Drive Carlton B. Goodlett Place  
27 City Hall, Room 234  
28 San Francisco, CA 94102

29 I declare under penalty of perjury that the foregoing is true and correct. Executed on May  
30 17, 2012.

31 /s/ C. D. Michel  
32 C. D. Michel  
33 Attorney for Plaintiffs