

**CIVIL NO.: 07-15763**

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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RUSSELL ALLEN NORDYKE, et al.,

*Plaintiffs and Appellants,*

vs.

MARY V. KING, et al.,

*Defendants and Appellees.*

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APPEAL FROM A JUDGMENT OF THE  
UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF CALIFORNIA  
HON. MARTIN J. JENKINS  
CV-99-04389-MJJ

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**MOTION FOR JUDICIAL NOTICE; DECLARATION OF  
T. PETER PIERCE AND EXHIBITS IN SUPPORT**

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COUNTY OF ALAMEDA

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*Attorneys for Defendants and Appellees*

**MOTION FOR JUDICIAL NOTICE**

Appellee County of Alameda (County) files this Motion for Judicial Notice concurrently with its response to appellants' motion to supplement the record.

This Court may take judicial notice of the briefs filed throughout this litigation. *See Corder v. Gates*, 104 F.3d 247, 248 n.1 (9th Cir. 1996). The County requests that the Court take judicial notice of the attached portions of the following briefs filed in this litigation, as authenticated by the attached Declaration of T. Peter Pierce:

- Exhibit "A" – a portion of "Respondents' Brief in Opposition" filed by the County on August 27, 2004 in response to appellants' Petition for a Writ of Certiorari.
- Exhibit "B" – a portion of the County's brief opposing appellants' motion in the District Court for leave to file a Second Amended Complaint.
- Exhibit "C" – a portion of the appellants' reply brief filed in the District Court in support of their motion for leave to file a Second Amended Complaint.

- Exhibit “D” – a portion of the County’s motion for summary judgment filed in the District Court.

Dated: March 29, 2012

DONNA ZIEGLER  
COUNTY COUNSEL  
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T. PETER PIERCE

By: \_\_\_\_\_s/\_\_\_\_\_  
T. PETER PIERCE  
Attorneys for Defendants and  
Appellees

**DECLARATION OF T. PETER PIERCE**

I, T. Peter Pierce, declare:

1. I am an attorney licensed by the State of California and I am admitted to practice before this Court. My colleague Sayre Weaver and I are the attorneys responsible for representing the County of Alameda in this appeal. I have personal knowledge of the matters set forth below.

2. Attached here as Exhibit "A" is a true and correct copy of a portion of the "Respondents' Brief in Opposition" filed by the County in the United States Supreme Court on August 27, 2004.

3. Attached here as Exhibit "B" is a true and correct copy of a portion of the County's brief opposing appellants' motion in the District Court for leave to file a Second Amended Complaint.

4. Attached here as Exhibit "C" is a true and correct copy of a portion of the following document served by appellants on my office: The appellants' reply brief in support of their motion for leave to file a Second Amended Complaint.

5. Attached here as Exhibit "D" is a true and correct copy of a portion of the motion for summary judgment filed by the County in the District Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 29, 2012.

\_\_\_\_\_  
s/  
T. Peter Pierce

# **EXHIBIT A**



U.S. Supreme Court, U.S.  
FILED  
AUG 27 2004  
OFFICE OF THE CLERK

No. 03-1707

In The  
**Supreme Court of the United States**

RUSSELL ALLEN NORDYKE, *et al.*

*Petitioners,*

v.

MARY V. KING, *et al.*

*Respondents.*

On Petition For A Writ Of Certiorari  
To The United States Court Of Appeals  
For The Ninth Circuit

**RESPONDENTS' BRIEF IN OPPOSITION**

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the interests of its inhabitants. Cal. Gov. Code § 23004(d).<sup>6</sup> In the proceedings in this case, the California Supreme Court has held that under Cal. Gov. Code section 23004(d) “a county is given substantial authority to manage its property, including the most fundamental decision as to how that property will be used. . . .” *Nordyke v. King*, 27 Cal.4th 875, 882, 118 Cal.Rptr.2d 761 (Cal. 2002) (citing to *Great Western Shows, Inc. v. County of Los Angeles*, 27 Cal.4th 853, 118 Cal.Rptr.2d 746 (Cal. 2002)); Pet. App. 86.

The Ordinance was enacted after a multiple shooting on the County-owned fairgrounds, during the County fair. Twelve people, most under the age of 21 and the youngest of whom was 8 years old, were injured in this incident. Excerpts of Record (“R”), Tab (“T”) 9, 2, ¶ 4. Emergency response teams, medical helicopters, and 157 law enforcement officers responded to the incident. R, T9, 3, ¶ 5. The alleged perpetrator was arrested in possession of a semi-automatic handgun and an extra ammunition clip and was charged. R, T9, 3, ¶ 6. The incident gave rise to nineteen tort claims, eleven of which could not be resolved and culminated in eleven liability lawsuits against the County. R, T13, 13-74. This incident, the high level of gun homicides and injuries in the County, and the fact that firearms rank as the leading cause of death for young people ages 15 through 24 in Alameda County, were among the findings made by the County Board of Supervisors in adopting the Ordinance. Ordinance, subd. (A); Pet. App. 94.

The Ordinance contains a few exceptions, including for persons such as peace officers, concealed carry permit holders, persons lawfully using the County target range, and participants in film, dance, theatre productions or events when the participant uses the firearm as part of the production or event and the firearm is secured when

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<sup>6</sup> Gov. Code Section 23004(d) provides that a county may “[m]anage, sell, lease, or otherwise dispose of its property as the interest of its inhabitants require.”

not in the actual possession of that person. Ordinance, subd. (F); Pet. App. 95-96. The foregoing exception allows firearms possession on County-owned property for events in which that possession can be readily supervised and the firearm is secured when not in the participant's actual possession. Ordinance, subd. (F)(4); Pet. App. 95-96. Some activities the Nordykes allege occur at their trade shows, such as historical reenactments and other firearms-related presentations, are consistent with this exception.<sup>6</sup>

The Alameda County Fair Association ("Fair Association"), a separate non-profit corporation, manages the fairgrounds, and is required to operate the fairgrounds in compliance with all federal, state and local laws. R, T1, 6, ¶ 22; R, T1, 35-37. In the past, Petitioners contracted with the Fair Association to use a part of the fairgrounds for their trade shows, generally for up to five events a year, on an event-by-event basis. R, T1, 7, ¶¶ 27-28. Petitioners then subleased spaces at their trade show events to various different types of vendors, collectors, and the like. R, T1, 8, ¶ 29. A large variety of items are offered for sale at their trade shows, including firearms. R, T1, 3, ¶ 10.

After the Ordinance was adopted, the Fair Association sent Petitioners a letter asking them to provide information as to how they intended to conduct their trade shows in compliance with the Ordinance. R, T1, 3, ¶ 33; R, T1, 36-37. *Petitioners did not respond to the letter.* They then

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<sup>6</sup> Petitioners cite to nothing in the record that would compel the conclusion that there are no circumstances in which this exception could be constitutionally applied. Nevertheless, they mischaracterize the exception as content-based. Pet. 30. What is plain from the record is that Petitioners are not concerned with whether certain activities that occur in conjunction with their trade show *could* take place at the fairgrounds consistent with the Ordinance. Instead, what they allege is that because the Ordinance will discourage their firearms vendors from participating in their trade show if it is held at the fairgrounds, it will become unprofitable for them to hold the trade show at the fairgrounds, and as a result, other activities that occur in conjunction with their trade show will also not take place. R, T1, 11, ¶ 37, T1, 17-19, ¶ 59.



## **EXHIBIT B**

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the County of Alameda Board of Supervisors

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RUSSELL ALLEN NORDYKE, et al.,

Plaintiffs,

v.

MARY V. KING, et al.,

Defendants.

Case No. CV-99-04389-MJJ

DEFENDANTS' MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
OPPOSITION TO PLAINTIFFS' MOTION  
FOR LEAVE TO FILE SECOND  
AMENDED COMPLAINT; EXHIBITS A,  
B, C, D, E IN SUPPORT THEREOF

Hearing Date: February 15, 2005  
Hearing Time: 9:30 a.m.  
Judge: Martin J. Jenkins  
U.S. Courthouse  
450 Golden Gate Avenue  
San Francisco, CA 94102

County Defendants King, Steele, Chan, Carson, Haggerty, the County of Alameda Board  
of Supervisors, and the County of Alameda (collectively "Defendants") submit this  
Memorandum in Opposition to Plaintiffs' Motion for Leave to File Second  
Amended/Supplemental Complaint.

Defendants Memorandum of Points and Authorities in Opposition to Plaintiffs  
Motion for Leave to File Second Amended Complaint

1 that individuals have no standing to assert an individual right to bear arms under the Ninth  
2 Amendment). Accordingly, the seventh claim of the proposed amended complaint also fails as a  
3 matter of law.

4 With respect to the remaining constitutional claims, Plaintiffs' have added the label "as  
5 applied" to substantially the same allegations as those set forth in the First Amended Complaint  
6 which Plaintiffs' previously failed to identify as either facial or as applied. Plaintiffs attempt to  
7 allege that they are now in a different procedural posture with respect to the challenged  
8 Ordinance because of "discriminatory enforcement." See proposed Fifth claim. However, as  
9 explained more fully below, a careful examination of the proposed amended complaint reveals  
10 that what Plaintiffs complain of is an exception to the prohibition on firearms possession that  
11 appears on the face of the Ordinance, pursuant to which some events involving firearms  
12 possession may take place, and have taken place, on the fairgrounds. Plaintiffs complain that by  
13 its terms the exception does not specifically exempt "gun shows" from the Ordinance. That  
14 however, is a part of Plaintiffs' failed facial challenge to the Ordinance.

15 Moreover, many activities Plaintiffs allege occur at the Nordykes' trade shows, such as  
16 historical enactments with firearms, firearms demonstrations, and other firearms-related  
17 presentations, are consistent with the terms of this exception. Yet none of these Plaintiffs  
18 alleges, nor could they allege, that they have sought the benefits of this exception with respect to  
19 any of the firearms-related activities they seek to engage in. Therefore they lack standing to  
20 make an "as applied" challenge to it. See *Madsen v. Boise State University*, 976 F.2d 1219,  
21 1220- 1221 (9th Cir. 1992) (holding that a plaintiff lacks standing to make an as applied  
22 challenge to a rule or policy to which he has not submitted himself by actually applying for the  
23 benefits).

24 But even if such an equal protection, as applied challenge could be made by these  
25 Plaintiffs to the exception set forth in the Ordinance, no amendment of the complaint is necessary  
26 for that purpose. Plaintiffs' equal protection challenge to the Ordinance has always included a  
27 pre-enforcement, as applied challenge. A pre-enforcement challenge may be either facial, or as  
28 applied, or both. See, e.g., *Clark v. Community for Creative Non-Violence*, 468 U.S. 288, 104

**EXHIBIT C**

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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RUSSELL ALLEN NORDYKE and SALLIE  
ANN NORDYKE, dba TS TRADE SHOWS,  
JESS B. GUY, DUANE DARR, WILLIAM  
J. JONES, DARYL N. DAVIS,, TASIANA  
WERTYSCHYN, JEAN LEE, TODD  
BALTES, DENNIS BLAIR, R. L. (Bob)  
ADAMS, ROGER BAKER, MIKE  
FOURNIER and VIRGIL McVICKER,

Plaintiffs,

vs.

GAIL STEELE, SCOTT HAGGERTY,  
KEITH CARSON, NATE MILEY, ALICE  
LAI-BITKER, The COUNTY OF  
ALAMEDA, and The COUNTY OF  
ALAMEDA BOARD OF SUPERVISORS,  
Defendants.

Case No.: **C 99 04389 MJJ**

**PLAINTIFFS' REPLY MEMORANDUM  
RE: MOTION FOR LEAVE TO FILE  
AMENDED PLEADING**

**Hearing Date: Feb. 15, 2005**

**Hearing Time: 9:30 A.M.**

**Judge: Martin J. Jenkins  
Courthouse: U.S. Court House  
450 Golden Gate Ave.  
San Francisco  
California 94102**

**INTRODUCTION**

Defendants' opposition to plaintiffs' motion for leave to file an amended/supplemental complaint under Federal Rule of Civil Procedure 15 reads more like a Rule 12 motion than a response to the very liberal rules governing amended/supplemental pleadings.



1 various state's national guards are equivalent.

- 2 c. Federal statutory law defining the "right to keep and bear arms" as  
3 a right that is held by citizens, and protected from encroachment  
4 along side rights set forth in the Ninth and Tenth Amendments to  
5 the United States Constitution. See: Firearm Owners' Protection  
6 Act of 1986, Pub. L. No. 99-308, 100 Stat. 449 (May 19, 1986).

7 [See request for judicial notice.]

- 8 d. Resolutions of Congress declaring an individual right to keep and  
9 bear arms. See: The United States Senate Committee on the  
10 Judiciary, Subcommittee on the Constitution issued a report titled  
11 The Right to Keep and Bear Arms. (1982) [See request for judicial  
12 notice.]

- 13 e. Policy statements by co-equal branches of the federal government  
14 declaring an individual right to keep and bear arms. See various  
15 opinions by the Solicitor General and the Attorney General of the  
16 United States. [See request for judicial notice.]

- 17 f. Declarations of rights found in a majority of state constitutions and  
18 the interpretations of those rights as personal and fundamental by  
19 the high courts of those respective states . See generally: The  
20 Right to Keep and Bear Arms in the State Bills of Rights and  
21 Judicial Interpretation, by Robert Dowlut. Published in the Journal  
22 on Firearms and Public Policy. (Volume 5, Issue 1, Fall 1993)

23  
24 Other Issues Raised in Defendant's Opposition

- 25 6. As applied to the plaintiffs in this action, the Alameda County Ordinance acts as a prior  
26 restraint of expressive conduct, not unlike the line of cases dealing with adult  
27 entertainment. Defendants are now suggesting – for the first time in this litigation, and  
28 despite the fact that the law of case is that the ordinance has the effect of banning gun

shows at the fairgrounds – that none of the plaintiffs ever sought permission to hold a gun show after the ordinance was enacted. Whether this is true, or even relevant, is not germane to the pleadings. It is however germane to plaintiffs’ contention that the ordinance is fatally flawed. The ordinance does not provide for any determination of who an “authorized participant” might be under 9.12.120(f)(4). Nor does it provide for administrative review or prompt judicial resolution. Nor does it even name the government official to whom plaintiff might apply to see if they can hold their gun show (or other event) under this exception. See generally: Freedman v. Maryland, 380 U.S. 51, 58-59, 13 L. Ed. 2d 649, 85 S. Ct. 734 (1965).

7. Defendants also appear to be parsing the language of their own ordinance to the point nonsensical interpretation. The exception at 9.12.120(f)(4) is for: “The possession of a firearm by an authorized participant in a motion picture, television, video, dance or theatrical production or event, . . .” The final “or” is clearly a conjunctive connector. The word “theatrical” modifies both “production” and “event” The defendants’ new theory that plaintiffs never applied to hold an gun show event, and should therefore be precluded from asserting “as applied” challenges is specious.

8. As noted above, the Ninth Circuit and California Supreme Court have already made findings that the ordinance makes gun shows at the fairgrounds virtually impossible. When the appellate court decides a legal issue, whether explicitly or by necessary implication, that decision generally is not open to relitigation in subsequent proceedings in the same case. [See United States ex rel. Lujan v. Hughes Aircraft Co., 243 F.3d 1181, 1186-1187 (9th Cir 2001); Leslie Salt Co. v. United States, 55 F.3d 1388, 1392-1393 (9th Cir. 1995) -- even summarily-treated issues become law of the case]

### CONCLUSION

Plaintiffs are well aware that their legal rights to hold gun shows at the fairgrounds will require a very careful adherence to the law of the case, circuit precedent and analogous case law. Some of the theories advanced by the plaintiffs are certainly subject to motions to dismiss with

**EXHIBIT D**

**COPY**

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**ORIGINAL  
FILED**

JUN - 5 2006

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUSSELL ALLEN NORDYKE, et al.,

Plaintiffs,

v.

MARY V. KING, et al.,

Defendants.

Case No. CV-99-04389-MJJ

**DEFENDANTS' NOTICE OF MOTION  
AND MOTION FOR SUMMARY  
JUDGMENT ON PLAINTIFFS' THIRD  
AMENDED COMPLAINT OR, IN THE  
ALTERNATIVE, FOR PARTIAL  
SUMMARY JUDGMENT ON  
INDIVIDUAL CAUSES OF ACTION;  
MEMORANDUM OF POINTS AND  
AUTHORITIES AND DECLARATIONS  
OF RICK K. PICKERING, T. PETER  
PIERCE AND JAMES KNUDSEN IN  
SUPPORT THEREOF**

[Request for Judicial Notice and Appendix  
of California Authorities filed concurrently]

DEPT.: 11  
JUDGE: Honorable Martin J. Jenkins  
DATE: July 11, 2006  
TIME: 9:30 a.m.

DEFENDANTS' NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT ON PLAINTIFFS' THIRD  
AMENDED COMPLAINT

sponsored by any national, state or local organization, devoted to the collection, competitive use, or other sporting use of firearms, or an organization or association that sponsors functions devoted to the collection, competitive use, or other sporting use of firearms in the community.” 27 C.F.R. § 478.100(b) (1988); *see also* Cal. Penal Code § 12071(b)(1)(B) (adopting federal definition by reference). These controlling statutes do not require, or even encourage, that “gun shows” be venues for firearms vendors or firearms sales. The statutes are silent on these issues. Thus, the heart of plaintiffs’ lawsuit – that the Ordinance has rendered their “gun shows” unprofitable – is born of a financial concern not even recognized by the federal and state definitions of “gun shows.”

The features of plaintiffs’ trade shows identified in their own TAC demonstrate that it *is possible* for plaintiffs to conduct their trade shows consistent with the Ordinance. The TAC lists 15 primary purposes for plaintiffs’ trade shows:

“[1] To obtain political information regarding my Constitutional Rights, including but not limited to the right to keep and bear firearms; [2] To assemble with other individuals and organizations to discuss the issues and pending legislation that effect my Constitutional Rights, including but not limited to, my right to own, possess, and trade firearms; [3] To obtain the latest information regarding the safe, responsible and lawful ownership and storage of firearms; [4] To obtain the latest information regarding the firearms industry, with specific reference to developments in technology and safety; [5] To purchase and/or sell firearms, firearm accessories, ammunition, safety devices and gun safes; [6] To petition political candidates, both those elected and currently campaigning, on issues of government policy; [7] To obtain information from political candidates, both those in office and campaigning, on issues of government policy; [8] To obtain and/or offer for sale historical and philosophic information from organizations sympathetic to, but not directly involved, with firearms issues; [9] To obtain information and engage in the trade of stamps and coins; [10] To obtain information and engage in the trade of knives; [11] To obtain information and engage in the trade of antiques and/or other collectibles; [12] To obtain information and engage in the trade of historical and military memorabilia; [13] To obtain information and engage in the trade of political souvenirs such as: buttons, bumper-stickers, t-shirts, books and signs; [14] To circulate and sign petitions for state and local initiatives; [and] [15] To engage in the fellowship and affiliation of like-minded individuals in a market-place of ideas and products, and to enjoy our common culture and collective heritage.” (TAC at ¶ 59 (a) through (o)).

All of these 15 purposes may be fulfilled *without the presence of a firearm*. The only listed purpose for which the presence of a firearm may be preferable is the purchase and sale of



that firearm. More importantly, the Ordinance can accommodate plaintiffs' stated goals; the Ordinance contains an exception to the ban on possession of firearms, allowing the following activities on County property: "The possession of a firearm by an authorized participant in a motion picture, television, video, dance or theatrical production or event, provided that when such firearm is not in the actual possession of the authorized participant, it is secured to prevent unauthorized use." (Ex. A, subd. (f)(4)). The unqualified word "event" preserves the possibility that any number of events may satisfy the exception. The Alameda County Fair Association has approved events other than motion picture, television, video, dance and theatrical productions where authorized participants have possessed firearms, and those firearms have been secured when not in the actual possession of the participant (*See* Pickering decl. at ¶ 13).

Accordingly, plaintiffs could engage in any number of activities using firearms – for example historical re-enactments – as permitted by the Ordinance's express exception to the ban (Ex. A, subd. (f)(4)). The Ordinance, therefore, may be applied in such a way as to allow plaintiffs to conduct their trade shows at the County Fairgrounds.

But plaintiffs have *chosen* not to conduct their trade shows at the County Fairgrounds. Plaintiffs want thousands of attendees (TAC at ¶ 45) to mill about, pick up thousands of firearms (TAC at ¶ 60.g), handle them, exchange them back and forth with each other and with dealers, because they believe that this activity will maximize their profits. That activity is inconsistent with the Ordinance's exception requiring firearms to be secured when not in someone's immediate possession (Ex. A, subd. (f)(4)). Stripped to its core, plaintiffs' disagreement with the Ordinance is not that it bans their trade shows entirely or even in substantial part, but that it does not allow plaintiffs to have the *type* of "gun show" (thousands of firearms present) that makes the most profit. The First Amendment does not provide any such guarantee.

The Ordinance, as applied to plaintiffs, must be upheld under *O'Brien*.

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///

///

### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on March 29, 2012.

I hereby certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

\_\_\_\_\_  
s/  
Clotilde Bigornia