

1 WRIGHT & L'ESTRANGE
2 Robert C. Wright (SBN 51864)
3 Andrew E. Schouten (SBN 263684)
4 401 West A Street, Suite 2250
5 San Diego, California 92101
6 (619) 231-4844
7 (619) 231-6710 (fax)

8 NATIONAL SHOOTING SPORTS FOUNDATION, INC.
9 Lawrence G. Keane, General Counsel
10 (*pro hac vice pending*)
11 11 Mile Hill Road
12 Newtown, Connecticut 06470
13 (203) 426-1320
14 (203) 426-7182 (fax)

15 Attorneys for Petitioners U.S. Firearms Company LLC, Eric W. Fisher, and
16 The National Shooting Sports Foundation, Inc.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

14	U.S. FIREARMS COMPANY LLC, a)	CASE NO.
	limited liability company; ERIC W.)	
15	FISHER; and THE NATIONAL)	DECLARATION OF ANDREW NIELSEN IN
	SHOOTING SPORTS)	SUPPORT OF REQUEST FOR
16	FOUNDATION, INC., a non-profit)	TEMPORARY RESTRAINING ORDER
	trade association,)	AND MOTION FOR PRELIMINARY
17)	INJUNCTION
	Petitioners,)	
18)	
	v.)	Date:
19)	Time:
	CITY OF SUNNYVALE; THE)	Dept:
20	SUNNYVALE CITY COUNCIL; and)	Judge:
	DOES 1 through 30, inclusive,)	
21)	
	Respondents.)	Complaint Filed:
22)	Trial Date: None

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24 Andrew Nielsen declares:

- 25 1. I reside in Campbell, California.
- 26 2. I am a college graduate with multiple technical certifications and work as a
- 27 product manager.
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3. I have purchased multiple types of firearms ammunition in California for five years without ever having to disclose personal information when doing so.

4. Since 2010, I have purchased ammunition at least once a month from U.S. Firearms Co. located at 590 S. Mary Avenue, Sunnyvale, California.

5. I am aware of an Ordinance recently passed by the City of Sunnyvale requiring the disclosure of an ammunition purchaser's name, address, date of birth, driver's license number, brand, type and quantity of ammunition purchased, and signature and thumbprint for each purchase of ammunition. I consider these requirements to be an invasion of my right to privacy.

6. If this Sunnyvale Ordinance regarding ammunition purchases becomes effective, I intend to cease purchasing ammunition from U.S. Firearms and any other ammunition seller located in the City of Sunnyvale. I intend to purchase ammunition from a seller located outside the City without similar requirements for the disclosure of personal information.

7. I am a law-abiding citizen and am not prohibited from owning firearms.

I declare under penalty of perjury, under the laws of California, that the foregoing is true and correct.

Executed on December 6, 2013, at Campbell, California.



Andrew Nielsen