

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

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

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

10  
11

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **IN AND FOR THE COUNTY OF SANTA CLARA**

14 U.S. FIREARMS COMPANY LLC, a )  
limited liability company; ERIC W. )  
15 FISHER; and THE NATIONAL )  
SHOOTING SPORTS )  
16 FOUNDATION, INC., a non-profit )  
trade association, )  
17 )  
Petitioners, )  
18 )  
v. )  
19 )  
CITY OF SUNNYVALE; THE )  
20 SUNNYVALE CITY COUNCIL; and )  
DOES 1 through 30, inclusive, )  
21 )  
Respondents. )  
22

CASE NO.  
**DECLARATION OF DR. JESUS L. BORRILLO IN SUPPORT OF REQUEST FOR TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION**  
Date:  
Time:  
Dept:  
Judge:

23  
24  
25  
26  
27  
28

Dr. Jesus L. Borrillo declares:  
1. I reside in Sunnyvale.  
2. I am a graduate of Northwestern University Medical School and specialize in retinal eye surgery.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. I have purchased multiple types of firearms ammunition in California for about seven years, without ever having to disclose personal information when doing so.

4. Since October 2010, I have purchased this ammunition from U.S. Firearms Co., located at 590 S. Mary Avenue, Sunnyvale, California. I typically purchase ammunition about once a quarter.

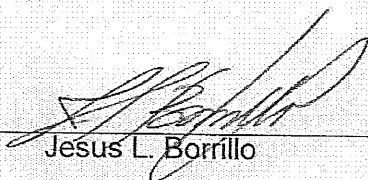
5. I am aware of an Ordinance recently passed by the City of Sunnyvale requiring the disclosure of an ammunition purchaser's name, address, date of birth, driver's license number, brand, type and quantity of ammunition purchased, and signature and thumbprint for each purchase of ammunition. I consider 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 sellers 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 Sunnyvale, California.

  
Jesus L. Borrillo