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

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

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

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

Eugene Tan declares:

1. I reside in Sunnyvale, California.

2. I have Bachelor's and Master's degrees from Western Michigan University and work as a professional in the computer industry.

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

4. Since 2010, I have purchased this ammunition regularly from U.S. Firearms Co. located at 590 S. Mary Avenue, Sunnyvale, California.

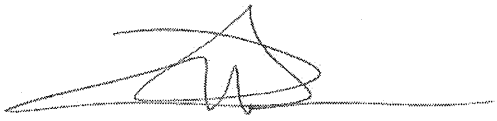
5. I am aware of an Ordinance recently passed by the City of Sunnyvale requiring the disclosure of an ammunition purchaser's name, address, date of birth, driver's license number, brand, type and quantity of ammunition purchased, and signature and thumbprint for each purchase of ammunition. I consider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

6. If this Sunnyvale Ordinance regarding ammunition purchase 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 over the Internet and from sellers located outside the City without similar requirements for the disclosure of personal information.

7. I am a law-abiding legal resident, and I 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.



Eugene Tan