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Stephen J. Lindley*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

ALVIN DOE and PAUL A. GLADDEN,

Plaintiffs,

v.

KAMALA D. HARRIS, in her official  
capacity as Attorney General of California;  
and STEPHEN J. LINDLEY, in his official  
capacity as Chief of the California  
Department of Justice Bureau of Firearms,

Defendants.

Case No. 34-2014-00163821

**DEFENDANTS' WRITTEN  
OBJECTIONS TO PLAINTIFFS'  
EVIDENCE IN SUPPORT OF  
OPPOSITION TO MOTION FOR  
PRELIMINARY INJUNCTION**

Date: July 8, 2014  
Time: 2:00 p.m.  
Dept: 53  
Judge: The Honorable David I. Brown  
Trial Date: None  
Action Filed: May 20, 2014

**DECLARATION OF KEN LUNDE**

**Matter Objected to:**

**Grounds for Objection:**

1. Exhibit 1

Irrelevant. (Evid. Code, §§ 350-351.)

2. Exhibit 2

Irrelevant. (Evid. Code, §§ 350-351.)

3. Exhibit 3

Irrelevant. (Evid. Code, §§ 350-351.)

DECLARATION OF ALVIN DOE

Matter Objected to:

Grounds for Objection:

1. Paragraph 6: "But for the fear of prosecution or other adverse action by the DOJ or law enforcement agencies, I would submit additional applications to purchase non-curio or relic handguns that would violate the DOJ's enforcement policy."

Lack of foundation for personal knowledge (Evid. Code, § 702, subd. (a)); improper opinion testimony. (Evid. Code, § 800.)

DECLARATION OF PAUL A. GLADDEN

Matter Objected to:

Grounds for Objection:

1. Paragraph 5: "But for the fear of prosecution or other adverse action by the DOJ or law enforcement agencies, I would submit additional applications to purchase non-curio or relic handguns that would violate the DOJ's enforcement policy."

Lack of foundation for personal knowledge (Evid. Code, § 702, subd. (a)); improper opinion testimony. (Evid. Code, § 800.)

VERIFIED COMPLAINT

Matter Objected to:

Grounds for Objection:

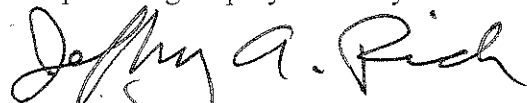
1. Paragraph 26: "If DOJ's enforcement policy is not enjoined, Plaintiffs will continue to face the threat of criminal sanctions for engaging in lawful activity or otherwise be prevented from lawfully purchasing firearms under the exemption provided in Section 27535(b)(9)."

Lack of foundation for personal knowledge (Evid. Code, § 702, subd. (a)); improper opinion testimony. (Evid. Code, § 800.)

Dated: June 24, 2014

Respectfully Submitted,

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