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Superior Court of California
County of Los Angeles

NOV 12 2015

Sherri R. Carter, Executive Officer/Clerk
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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9

IN AND FOR THE COUNTY OF LOS ANGELES

10

STANLEY MOSK COURTHOUSE

11

12 SHASTA COUNTY SHERIFF THOMAS BOSENKO,
SAN BERNARDINO COUNTY SHERIFF JOHN
MCMAHON, KERN COUNTY SHERIFF DONNY
13 YOUNGBLOOD, SAN LUIS OBISPO COUNTY
SHERIFF IAN S. PARKINSON, SACRAMENTO
14 COUNTY SHERIFF SCOTT JONES, EL DORADO
COUNTY SHERIFF JOHN D'AGOSTINI, SISKIYOU
15 COUNTY SHERIFF JON LOPEY, TOULUMNE
COUNTY SHERIFF JAMES MELE, STANISLAUS
16 COUNTY SHERIFF ADAM CHRISTIANSON,
MERCED COUNTY SHERIFF VERN WARNKE,
17 TEHAMA COUNTY SHERIFF DAVID HENCRATT,
HUMBOLDT COUNTY SHERIFF MICHAEL
18 DOWNEY, MENDOCINO COUNTY SHERIFF
THOMAS D. ALLMAN, SUTTER COUNTY
19 SHERIFF J. PAUL PARKER, MODOC COUNTY
SHERIFF MICHAEL POINDEXTER, FRESNO
20 COUNTY SHERIFF MARGARET MIMS, MADERA
COUNTY SHERIFF JAY VARNEY, AMADOR
21 COUNTY SHERIFF MARTIN RYAN, LASSEN
COUNTY SHERIFF DEAN F. GROWDON,
22 COLUSA COUNTY SHERIFF JOE GAROFALO,
NEVADA COUNTY SHERIFF KEITH ROYAL,
23 TULARE COUNTY SHERIFF MIKE BOUDREAUX,
YUBA COUNTY SHERIFF STEVE DURFOR,
24 KINGS COUNTY SHERIFF DAVID ROBINSON,
PLUMAS COUNTY SHERIFF GREGORY
25 HAGWOOD, TRINITY COUNTY SHERIFF BRUCE
HANEY, SOLANO COUNTY SHERIFF THOMAS A.
26 FERRARA, GLENN COUNTY SHERIFF RICHARD
L. WARREN JR., BUTTE COUNTY SHERIFF
27 KORY L. HONEA, SIERRA COUNTY SHERIFF
TIM STANDLEY, CHAD CHEUNG, PAUL
28 WOLCOTT, JAMES WILEY, PAUL NORDBERG,

Case No.: BS158682

**DECLARATION OF PLAINTIFF PAUL
NORDBERG IN SUPPORT OF EX PARTE
APPLICATION TO STAY
ENFORCEMENT OF LAMC SECTION
46.30, ALTERNATIVELY, FOR
TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE**

Date: November 12, 2015

Time: 8:30 a.m.

Dept.: 85

Judge: Honorable James C. Chalfant

Action Filed: October 23, 2015

1 JULIO BERNAL, KENNETH TAKAHASHI, LAW
2 ENFORCEMENT ALLIANCE OF AMERICA, INC.,
3 CALIFORNIA RIFLE AND PISTOL ASSOCIATION,
4 CALIFORNIA RESERVE PEACE OFFICERS
5 ASSOCIATION,

6 Plaintiffs and Petitioners,

7 vs.

8 THE CITY OF LOS ANGELES, MAYOR ERIC
9 GARCETTI, in his official capacity, LOS
10 ANGELES POLICE DEPARTMENT CHIEF
11 CHARLIE BECK, in his official capacity, and
12 DOES 1-10,

13 Defendants and Respondents

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DECLARATION OF PAUL NORDBERG

I, Paul Nordberg, declare as follows:

1. I am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner.

3. I am a resident of the city of Los Angeles, California.

4. I am the President of Calguns.net and the Vice President of the Calguns Shooting Sports Foundation.

5. I lawfully own and possess within my Los Angeles residence ammunition magazines with the capacity to accept more than ten rounds that are prohibited by section 46.30 of the Los Angeles Municipal Code.

6. I lawfully possess these magazines under state law while traveling in and out of the city of Los Angeles to attend monthly shooting events, educational classes, and competitions sponsored

1 by both Calguns.net and the Calguns Shooting Sports Foundation. The magazines the City
2 prohibits are an integral part of the training equipment for these events.

3 7. I regularly use magazines with the capacity to accept more than ten rounds that are
4 prohibited by the City of Los Angeles as part of my business operations for Calguns.net and the
5 Calguns Shooting Sports Foundation.

6 8. I travel between my residence and locations outside California while possessing
7 magazines with the capacity to accept more than ten rounds for a number of lawful purposes,
8 including attendance at shooting events and civil rights conferences.

9 9. Section 46.30 prohibits me from continuing to possess my lawfully-owned magazines
10 with the capacity to accept more than ten rounds in my home on or after November 19, 2015.

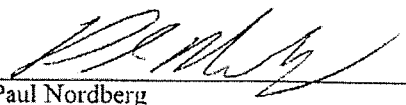
11 10. Section 46.30 prohibits me from continuing to possess my lawfully-owned magazines
12 with the capacity to accept more than ten rounds while traveling between my Los Angeles
13 residence and locations inside and outside California for use in my normal business operations
14 and for other lawful purposes, on or after November 19, 2015.

15 11. If I transfer my lawfully-owned magazines with the capacity to accept more than ten
16 rounds, or if I turn them into the Los Angeles Police Department for destruction, I will not be able
17 to reacquire them.

18 12. I fear arrest and criminal prosecution if I continue to possess my magazines with the
19 capacity to hold more than ten rounds in the city of Los Angeles on or after November 19, 2015.

20 I declare under the penalty of perjury under the laws of the State of California that the forgoing is
21 true and correct.

22 Executed this 4TH day of November, 2015 in RESOLLA, California.

23
24 
25 Paul Nordberg

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 I, Laura L. Quesada, am employed in the City of Long Beach, Los Angeles County,
5 California. I am over the age eighteen (18) years and am not a party to the within action. My
6 business address is 180 East Ocean Blvd., Suite 200, Long Beach, California 90802.

7 On November 6, 2015, I served the foregoing document(s) described as

8 **DECLARATION OF PLAINTIFF PAUL NORDBERG IN SUPPORT OF EX PARTE
9 APPLICATION TO STAY ENFORCEMENT OF LAMC SECTION 46.30,
10 ALTERNATIVELY, FOR TEMPORARY RESTRAINING ORDER AND ORDER TO
11 SHOW CAUSE**

12 on the interested parties in this action by placing [] the original [X] a true and correct copy
13 thereof addressed as follows:

14 Mr. Benjamin Chapman
15 Deputy City Attorney
16 200 North Main Street, 9th Floor,
17 Los Angeles, California, 90012
18 Phone: (213) 473-6858
19 E-mail: benjamin.chapman@lacity.org

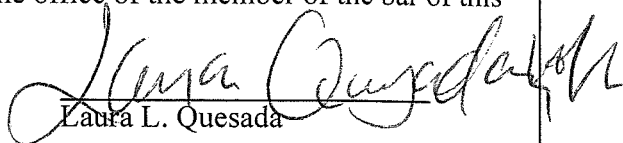
20 X (**BY MAIL**) As follows: By placing the sealed envelope for collection and mailing. I am
21 "readily familiar" with the firm's practice of collection and processing correspondence for
22 mailing. Under the practice it would be deposited with the U.S. Postal Service on that
23 same day with postage thereon fully prepaid at Long Beach, California, in the ordinary
24 course of business. I am aware that on motion of the party served, service is presumed
25 invalid if postal cancellation date is more than one day after date of deposit for mailing an
26 affidavit. Executed on November 6, 2015, at Long Beach, California.

27 (**VIA OVERNIGHT MAIL**) As follows: I am "readily familiar" with the firm's practice
28 of collection and processing correspondence for overnight delivery by UPS/FED-EX.
Under the practice it would be deposited with a facility regularly maintained by
UPS/FED-EX for receipt on the same day in the ordinary course of business. Such
envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery
fees paid or provided for in accordance with ordinary business practices.
Executed on November __, 2015, at Long Beach, California.

X (**VIA ELECTRONIC MAIL**) As follows: I served a true and correct copy by electronic
transmission. Said transmission was reported and completed without error.
Executed on November 6, 2015, at Long Beach, California.

X (**STATE**) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

 (**FEDERAL**) I declare that I am employed in the office of the member of the bar of this
court at whose direction the service was made.

27
28 
Laura L. Quesada