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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 WESTERN DIVISION

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14 **MICHELLE FLANAGAN, SAMUEL**  
15 **GOLDEN, DOMINIC NARDONE,**  
16 **JACOB PERKIO, and THE**  
**CALIFORNIA RIFLE & PISTOL**  
**ASSOCIATION, INC.,**

17 Plaintiffs,

18 v.

19 **XAVIER BECERRA, in his official**  
20 **capacity as Attorney General of the**  
21 **State of California, and JAMES**  
22 **McDONNELL, in his official capacity**  
**as Sheriff of Los Angeles County,**  
**California,**

23 Defendants.  
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Case No. 2:16-cv-06164-JAK-AS

**DECLARATION OF JONATHAN**  
**M. EISENBERG IN SUPPORT OF**  
**DEFENSE RESPONSE TO**  
**OBJECTIONS TO AWARD OF**  
**COSTS OF SUIT TO DEFENSE**

25 I, Jonathan M. Eisenberg, declare as follows:

- 26 1. I have personal knowledge of the following facts and, if called as a  
27 witness in a relevant proceeding, would testify competently to the following facts.  
28 2. I am an attorney licensed to practice law in California and in this

1 Court. I am a deputy attorney general in the Office of the California Attorney  
2 General in Los Angeles. I am one of the attorneys of records in this case,  
3 representing Defendant Xavier Becerra, California Attorney General, sued here in  
4 his official capacity, adverse to Plaintiffs Michelle Flanagan, Samuel Golden,  
5 Dominic Nardone, Jacob Perkio, and the California Rifle & Pistol Association, Inc.

6 3. Over the past three days, I have conducted fact research for the  
7 preparation of Defendant's response to the May 14, 2018, objections to the  
8 proposed judgment, interposed by Plaintiffs.

9 4. Online at the Internet page located at  
10 <https://www.nraila.org/articles/20170208/california-2017-february-litigation-report>,  
11 which I accessed freely from my work computer, I located a link to a report titled  
12 "NRA CRPA California Legal Affairs February 2017," purportedly authored by  
13 Michel & Associates, P.C., Plaintiffs' counsel in this case. From the link, I  
14 downloaded a copy of the report. Attached hereto as Exhibit A is a true and correct  
15 copy of the report.

16 5. At the Internet site called Charity Navigator,  
17 <https://www.charitynavigator.org>, for which I have an account, I located the 2015  
18 federal tax return for the National Rifle Association of America (the "NRA"). That  
19 tax return was the most recent one available for the NRA. I downloaded the tax  
20 return. Attached hereto as Exhibit B is a true and correct copy of that tax return.

21 I declare under the penalty of perjury under the laws of the United States of  
22 America that the foregoing is true and correct, and that I signed this declaration on  
23 May 17, 2018, at South Pasadena, California.

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Jonathan M. Eisenberg