

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI‘I

RONALD G. LIVINGSTON;
MICHAEL J. BOTELLO; KITIYA M.
SHIROMA; JACOB STEWART; and
HAWAII RIFLE ASSOCIATION,

Plaintiffs,

v.

SUSAN BALLARD, in her official
capacity as Police Chief of the City &
County of Honolulu; CITY &
COUNTY OF HONOLULU; and
CLARE E. CONNORS, in her official
capacity as Attorney General of
Hawai‘i,

Defendants.

CIVIL NO. 19-00157 JMS-RT

DECLARATION OF CLYDE J.
WADSWORTH

DECLARATION OF CLYDE J. WADSWORTH

I, CLYDE J. WADSWORTH, hereby state and declare as follows:

1. I am the Solicitor General for the State of Hawai‘i and an attorney of record representing Defendant Clare E. Connors, in her official capacity as Attorney General of Hawai‘i, in this action. Unless otherwise stated, I make this declaration upon personal knowledge and am competent to testify as to the matters set forth herein.

2. Attached hereto as Exhibit “A” is a true and correct copy of the Complaint filed on June 12, 2012, in *Young v. Hawaii*, Civ. No. 12-00336 HG-BMK.

3. Attached hereto as Exhibit “B” is a true and correct copy of the Petition for Rehearing *En Banc* filed in the Ninth Circuit on September 14, 2018, in *Young v. Hawaii*, No. 12-17808.

4. Attached hereto as Exhibit “C” is a true and correct copy of the Ninth Circuit’s order entered on February 14, 2019, staying *en banc* proceedings in *Young v. Hawaii*, No. 12-17808.

5. Attached hereto as Exhibit “D” is a true and correct copy of Appellant George K. Young Jr.’s citation of supplemental authorities filed in the Ninth Circuit on April 12, 2019, in *Young v. Hawaii*, No. 12-17808, including a letter submitted to the United States Supreme Court by the City of New York in *New York State Rifle & Pistol Association, Inc. v. City of New York*, No. 18-280.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawai‘i, April 17, 2019.

/s/ Clyde J. Wadsworth
CLYDE J. WADSWORTH