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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 NATIONAL RIFLE ASSOCIATION OF  
14 AMERICA; JOHN DOE,

15 Plaintiffs,

16 vs.

17 CITY OF LOS ANGELES, ERIC  
18 GARCETTI, in his official capacity as  
19 Mayor of City of Los Angeles; HOLLY  
20 L. WOLCOTT, in her official capacity as  
21 City Clerk of City of Los Angeles; and  
22 DOES 1-10,

23 Defendants.

Case No.: 2:19-cv-03212 SVW (GJSx)

**DECLARATION OF TIFFANY D.  
CHEUVRONT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Date: July 8, 2019

Time: 1:30 p.m.

Judge: Honorable Stephen V. Wilson

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**DECLARATION OF TIFFANY D. CHEUVRONT**

1. I am an attorney at the law firm Michel & Associates, P.C., attorneys of record for Plaintiffs in this action. I am licensed to practice law before the United States District Court for the Southern District of California. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto.

2. I represent Plaintiff John Doe in this action.

3. Doe operates a lawful business in the state of California.

4. Doe has a history of contracting with the city of Los Angeles.

5. Doe wishes to continue bidding for and obtaining such contracts in the future.

6. Doe is also a long-time member and supporter of NRA and its mission.

7. Doe fears that if their identity and support of NRA were made public, their contracts with the city of Los Angeles would be in jeopardy. Indeed, Doe wishes to keep their association with NRA private because they reasonably fear retribution from the City, including the loss of current and future city contracts.

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

Executed within the United States on May 24, 2019.

/s/ Tiffany D. Chevront  
Tiffany D. Chevront  
Declarant

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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *National Rifle Association, et al., v. City of Los Angeles, et al.*  
Case No: 2:19-cv-03212 SVW (GJSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Benjamin F. Chapman  
Los Angeles City Attorney  
200 N. Main St., Suite 675  
Los Angeles, CA 90012  
[benjamin.chapman@lacity.org](mailto:benjamin.chapman@lacity.org)  
*Attorneys for Defendants*

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

Executed May 24, 2019.

/s/ Laura Palmerin  
Laura Palmerin