4 5 6 7 8 9 10 11 12 13	180 East Ocean Blvd., Suite 200 Long Beach, CA 90802 Telephone: 562-216-4444 Facsimile: 562-216-4445 cmichel@michellawyers.com Attorneys for Plaintiffs <b>UNITED STATES D</b> <b>CENTRAL DISTRICT</b> NATIONAL RIFLE ASSOCIATION OF AMERICA; JOHN DOE, Plaintiffs,	
14 15 16	vs. CITY OF LOS ANGELES, ERIC GARCETTI, in his official capacity as Mayor of City of Los Angeles; HOLLY	PRELIMINARY INJUNCTIONDate:July 8, 2019Time:1:30 p.m.Judge:Honorable Stephen V. Wilson
17 18 19	L. WOLCOTT, in her official capacity as City Clerk of City of Los Angeles; and DOES 1-10,	Judge. Honorable Stephen V. Wilson
20	Defendants.	
21		
22		
23		
24 25		
23		
26		
26 27		
26 27 28		
27	1	

1	<b>DECLARATION OF TIFFANY D. CHEUVRONT</b>		
2	1.	I am an attorney at the law firm Michel & Associates, P.C., attorneys of	
3	record for	Plaintiffs in this action. I am licensed to practice law before the United	
4	States Dis	trict Court for the Southern District of California. I have personal	
5	knowledge	e of the facts set forth herein and, if called and sworn as a witness, could	
6	and would	testify competently thereto.	
7	2.	I represent Plaintiff John Doe in this action.	
8	3.	Doe operates a lawful business in the state of California.	
9	4.	Doe has a history of contracting with the city of Los Angeles.	
10	5.	Doe wishes to continue bidding for and obtaining such contracts in the	
11	future.		
12	6.	Doe is also a long-time member and supporter of NRA and its mission.	
13	7.	Doe fears that if their identity and support of NRA were made public,	
14	their contracts with the city of Los Angeles would be in jeopardy. Indeed, Doe		
15	wishes to keep their association with NRA private because they reasonably fear		
16	retribution from the City, including the loss of current and future city contracts.		
17	I declare under penalty of perjury that the foregoing is true and correct.		
18	Executed within the United States on May 24, 2019.		
19			
20		/s/ Tiffany D. Cheuvront	
21		Tiffany D. Cheuvront	
22		Declarant	
23			
24			
25			
26			
27			
28			
	2		
		DECLARATION OF TIFFANY D. CHEUVRONT	

1       CERTIFICATE OF SERVICE         2       IN THE UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA         4       Case Name: National Rifle Association, et al., v. City of Los Angeles, et al.         5       Case No: 2:19-cv-03212 SVW (GJSx)         5       IT IS HEREBY CERTIFIED THAT:         6       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.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION Istrict Court using its ECF System, which electronically notifies them.         13       Benjamin F. Chapman Los Angeles, City Attorney 200 N. Main SL, Suite 675 Los Angeles, CA 90012 benjamin.chapman@lacity.org Attorneys for Defendants         11       I declare under penalty of perjury that the foregoing is true and correct.         12       Executed May 24, 2019.         13       Secouted May 24, 2019.         14       Low Angeles, CA 90012         15       Executed May 24, 2019.         16       Executed May 24, 2019.         17       Laura Palmerin         18       CERTIFICATE OF SERVICE					
2       IN THE UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA         3       Case Name: National Rifle Association, et al., v. City of Los Angeles, et al.         4       Case No: 2:19-cv-03212 SVW (GJSx)         5       IT IS HEREBY CERTIFIED THAT:         6       It is thereby CERTIFIED THAT:         7       years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long         8       Beach, California 90802.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF         11       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF         12       on the following party by electronically filing the foregoing with the Clerk of the         13       Benjamin F, Chapman         14       Los Angeles City Attorney         15       Los Angeles, CA 90012         16       beniamin.chapman@lacity.org         17       I declare under penalty of perjury that the foregoing is true and correct.         18       I declare under penalty of perjury that the foregoing is true and correct.         19 <i>Los Angeles</i> , CA 90012         10 <i>Laura Palmerin</i> 11       Laura Palmerin         12       1         13       Laura Palm	1	CERTIFICATE OF SERVICE			
3       Case Name: National Rifle Association, et al., v. City of Los Angeles, et al. Case No: 2:19-cv-03212 SVW (GJSx)         5       IT IS HEREBY CERTIFIED THAT:         6       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.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION         11       on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.         12       200 N. Main St., Suite 675         13       Benjamin F, Chapman         14       Los Angeles, CA 90012         15       Los Angeles, CA 90012         16       benjamin, Chapman @lacity.org         17       Attorneys for Defendants         18       I declare under penalty of perjury that the foregoing is true and correct.         19       Executed May 24, 2019.         20       /s/ Laura Palmerin         21       22         22       23         23       24         24       25         25       26         26       27	2	IN THE UNITED STATES DISTRICT COURT			
4       Case No: 2:19-cv-03212 SVW (GJSx)         5       IT IS HEREBY CERTIFIED THAT:         6       I, the undersigned, am a citizen of the United States and am at least eighteen vears of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION         11       on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.         13       Benjamin F. Chapman Los Angeles City Attorney         14       Los Angeles City Attorney         15       Los Angeles, CA 90012         16       benjamin.chapman@lacity.org         7       Attorneys for Defendants         11       I declare under penalty of perjury that the foregoing is true and correct.         18       I declare under penalty of perjury that the foregoing is true and correct.         19       Ks/Laura Palmerin         20       Image: Capital Company Comp	3				
6       IT IS HEREBY CERTIFIED THAT:         7       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.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION         12       on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.         13       Benjamin F. Chapman Los Angeles City Attorney 200 N. Main St., Suite 675 Los Angeles, CA 90012         16       benjamin.chapman@lacity.org         17       I declare under penalty of perjury that the foregoing is true and correct.         18       I declare under penalty of perjury that the foregoing is true and correct.         19       Executed May 24, 2019.         20 <u>/s/ Laura Palmerin</u> 21       23         22       23         23       24         24       25         25       26         26       27         27       28					
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         200 N. Main St., Suite 675         200 N. Main St., Suite 675         201 Attorneys for Defendants         I declare under penalty of perjury that the foregoing is true and correct.         Iscutted May 24, 2019.         /s/ Laura Palmerin         21         23         24         25         26         27         28		IT IS HEREBY CERTIFIED THAT:			
7       years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.         9       I am not a party to the above-entitled action. I have caused service of:         10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION         11       on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.         13       Benjamin F. Chapman Los Angeles City Attorney         14       200 N. Main St., Suite 675         15       Los Angeles, CA 90012         16       benjamin.chapman@@lacity.org         17       Attorneys for Defendants         18       I declare under penalty of perjury that the foregoing is true and correct.         19       Executed May 24, 2019.         20       /s/ Laura Palmerin         21       1         23       24         24       25         25       26         26       27         28       28		I, the undersigned, am a citizen of the United States and am at least eighteen			
10       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF         11       DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF         12       on the following party by electronically filing the foregoing with the Clerk of the         13       District Court using its ECF System, which electronically notifies them.         14       Benjamin F. Chapman         10       Los Angeles City Attorney         200 N. Main St., Suite 675         10       Los Angeles, CA 90012         16       benjamin.chapman@lacity.org         17       I declare under penalty of perjury that the foregoing is true and correct.         18       Executed May 24, 2019.         10 <u>/s/ Laura Palmerin</u> 12       Laura Palmerin         13       Laura Palmerin         14       Laura Palmerin         15       Los Palanetics         16       Los Palanetics         17       Los Palanetics         18       Los Palanetics         19       Los Palanetics         10       Laura Palmerin         11       Laura Palmerin		years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long			
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         Attorneys for Defendants         I declare under penalty of perjury that the foregoing is true and correct.         Executed May 24, 2019.         20         /s/ Laura Palmerin         Laura Palmerin         21         223         24         25         26         27         28	9	I am not a party to the above-entitled action. I have caused service of:			
<ul> <li>an the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.</li> <li>Benjamin F. Chapman Los Angeles City Attorney 200 N. Main St., Suite 675 Los Angeles, CA 90012 benjamin.chapman@lacity.org Attorneys for Defendants I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019. </li> <li><i>/s/ Laura Palmerin</i> Laura Palmerin </li> </ul>	10				
<ul> <li>District Court using its ECF System, which electronically notifies them.</li> <li>Benjamin F. Chapman Los Angeles City Attorney 200 N. Main St., Suite 675 Los Angeles, CA 90012</li> <li>benjamin.chapman@lacity.org Attorneys for Defendants</li> <li>I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019.</li> <li>20</li> <li>21</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	11	PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION			
14       Benjamin F. Chapman         15       Los Angeles City Attorney         15       200 N. Main St., Suite 675         16       benjamin.chapman@lacity.org         17       Attorneys for Defendants         18       I declare under penalty of perjury that the foregoing is true and correct.         19       Executed May 24, 2019.         20       /s/ Laura Palmerin         21       Laura Palmerin         22       23         23       24         25       26         27       28	12				
<ul> <li>Los Angeles Citý Attorney</li> <li>200 N. Main St., Suite 675 Los Angeles, CA 90012</li> <li>benjamin.chapman@lacity.org Attorneys for Defendants</li> <li>I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019.</li> <li><i>/s/ Laura Palmerin</i> Laura Palmerin</li> <li>Laura Palmerin</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	13	Benjamin F. Chanman			
<ul> <li>Los Angeles, CA 90012</li> <li>benjamin.chapman@lacity.org Attorneys for Defendants</li> <li>I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019.</li> <li><u>/s/ Laura Palmerin</u> Laura Palmerin</li> <li>Laura Palmerin</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	14	Los Angeles City Attorney			
<ul> <li>benjamin.chapman@lacity.org Attorneys for Defendants</li> <li>I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019.</li> <li><i>/s/ Laura Palmerin</i> Laura Palmerin</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> </ul>	15				
<ul> <li>I declare under penalty of perjury that the foregoing is true and correct.</li> <li>Executed May 24, 2019.</li> <li><i>/s/ Laura Palmerin</i></li> <li>Laura Palmerin</li> </ul>	16	benjamin.chapman@lacity.org			
18     1     1     1     1     1       19     Executed May 24, 2019.     /s/ Laura Palmerin       21     Laura Palmerin       22     1       23     1       24     1       25     1       26     1       27     1       28     1	17				
20       /s/ Laura Palmerin         21       Laura Palmerin         22       23         23       24         25       26         27       28	18	I declare under penalty of perjury that the foregoing is true and correct.			
Laura Palmerin Laura Palmerin 22 23 24 25 26 27 28	19	Executed May 24, 2019.			
21         22         23         24         25         26         27         28	20				
23 24 25 26 27 28	21	Laura Palmerin			
24 25 26 27 28	22				
25 26 27 28	23				
26 27 28	24				
27 28	25				
28	26				
28					
CERTIFICATE OF SERVICE	_0				
		CERTIFICATE OF SERVICE			