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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, HERB WESSON, in his official
20 capacity as President of the City Council
21 for the City of Los Angeles, and HOLLY
22 L. WOLCOTT, in her official capacity as
23 City Clerk

24 Defendants.

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

**PLAINTIFFS’ NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY INJUNCTION**

Date: July 8, 2019

Time: 1:30 p.m.

Judge: Honorable Stephen V. Wilson

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
2 RECORD: Notice is hereby given that on July 8, 2019, at 1:30 p.m. in Courtroom
3 10A of the above captioned court, located at 350 West 1st Street, Courtroom 10A,
4 10th Floor, Los Angeles, California 90012, Plaintiffs National Rifle Association and
5 John Doe will move for a preliminary injunction under Rule 65 (a) of the Federal
6 Rules of Civil Procedure. Specifically, Plaintiffs will seek an order temporarily
7 enjoining Defendants, their agents, servants, employees, and those working in active
8 concert with Defendants from enforcing or giving effect to Ordinance No. 186000
9 for the pendency of this action.

10 Plaintiffs bring this motion because the Defendants' actions, in passing and
11 enforcing Ordinance No. 186000, have violated and continue to violate Plaintiffs'
12 First Amendment rights to free speech and association, as well as Plaintiffs'
13 Fourteenth Amendment right to equal protection. Unless this Court orders the
14 requested preliminary relief, Plaintiffs and other similarly situated will suffer
15 irreparable injury as described in Plaintiffs' memorandum of points and authorities.

16 This motion is based on this notice of motion and motion, as well as the
17 memorandum of points and authorities, the declarations of Anna M. Barvir and
18 Tiffany D. Chevront, the request for judicial notice, and all exhibits filed
19 simultaneously herewith. This motion is also based on the pleadings and all records
20 already on file and on any further matters this Court deems appropriate.

21
22 Dated: May 24, 2019

MICHEL & ASSOCIATES, P.C.

23
24 /s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Plaintiffs

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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:

**PLAINTIFFS' NOTICE OF MOTION AND 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.

/s/ Laura Palmerin
Laura Palmerin