

1 C. D. Michel – SBN 144258  
cmichel@michellawyers.com  
2 Sean A. Brady – SBN 262007  
sbrady@michellawyers.com  
3 Matthew D. Cubeiro – SBN 291519  
mcubeiro@michellawyers.com  
4 MICHEL & ASSOCIATES, P.C.  
180 East Ocean Boulevard, Suite 200  
5 Long Beach, CA 90802  
Telephone: 562-216-4444  
6 Facsimile: 562-216-4445

7 Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SOUTHERN DIVISION**

11 STEVEN RUPP, et al.,

12 Plaintiffs,

13 v.

14 XAVIER BECERRA, in his  
official capacity as Attorney  
General of the State of California,

15 Defendant.  
16

Case No.: 8:17-cv-00746-JLS-JDE

**NOTICE OF ERRATA RE:  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

17  
18 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**  
19 **RECORD:**

20 **PLEASE TAKE NOTICE** that Plaintiffs file this Notice of Errata to correct  
21 an error in the Memorandum of Points and Authorities in Support of Plaintiffs'  
22 Motion for Summary Judgment and Plaintiffs' Statement of Uncontroverted Facts  
23 and Conclusions of Law in Support of Motion for Summary Judgment, both of which  
24 were filed on March 25, 2019. In these filings, Plaintiffs cited the following sources:

- 25 1) John Henwood, *The 8 and the 81: A History of Remington's Pioneer*  
26 *Autoloading Rifles* 4-5 (1993); and,  
27  
28

1           2) John Henwood, *The Forgotten Winchesters: A History of the Models 1905,*  
2           *1907, and 1910 Self-Loading Rifles* 2-6, 22-23, 115-24 (1995).

3           On April 18, 2019, Counsel for Defendant emailed Plaintiffs' counsel, stating  
4 that Defendants were not able to locate these documents in the supporting papers or  
5 Plaintiffs' document productions. As a result of that communication, Plaintiffs  
6 realized that they had incorrectly cited the source of these references in a way that  
7 indicated Plaintiffs relied on directly on the materials themselves. The source of both  
8 references, however, are from the dissenting opinion in *Heller v. District of*  
9 *Columbia*, 670 F.3d 1244, 1287 (D.C. Circuit 2011).

10          Plaintiffs have, therefore, edited the citation to those references on page 13 of  
11 their Memorandum of Points and Authorities in Support of Plaintiffs' Motion for  
12 Summary Judgment to reflect the true source of that reference as being from a  
13 judicial opinion. As a result of the citations being edited, other citations moved to  
14 different pages; thus, the table of contents has been edited to reflect the new page  
15 numbers for those citations. Plaintiffs have also deleted citations to those references  
16 in support of SUF No. 34 in Plaintiffs' Statement of Uncontroverted Facts and  
17 Conclusions of Law in Support of Motion for Summary Judgment.

18          In reviewing the Memorandum of Points and Authorities in Support of  
19 Plaintiffs' Motion for Summary Judgment, Plaintiffs noticed two typographical errors  
20 that they have also corrected. They are as follows:

21           1) On page 14, the word "estimates" was inadvertently omitted from the quote  
22           following the word "conservative":

23           2) On page 16, the word "Riles" has been replaced with "Rifles."

24           Neither correction makes any substantive change.

25           Plaintiffs have made no other changes to these documents.

1 The corrected versions of both the Memorandum of Points and Authorities in  
2 Support of Plaintiffs' Motion for Summary Judgment and Plaintiffs' Statement of  
3 Uncontroverted Facts and Conclusions of Law in Support of Motion for Summary  
4 Judgment are filed simultaneously with this Notice of Errata.

5  
6 Dated: April 26, 2019

**MICHEL & ASSOCIATES, P.C.**

7  
8 /s/ Sean A. Brady

9 Sean A. Brady  
10 Attorneys for Plaintiffs  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

Case Name: *Rupp, et al. v. Becerra*  
Case No.: 8:17-cv-00746-JLS-JDE

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:

**NOTICE OF ERRATA RE: MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

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

Xavier Becerra  
Attorney General of California  
Peter H. Chang  
Deputy Attorney General  
E-mail: peter.chang@doj.ca.gov  
John D. Echeverria  
Deputy Attorney General  
E-mail: john.echeverria@doj.ca.gov  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102

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

Executed April 26, 2019.

/s/Christina Castron  
Christina Castron

FIRM: MICHEL & ASSOCIATES, P.C.  
180 E OCEAN BLVD  
STE 200  
LONG BEACH CA 90802  
PH: 562-216-4444

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ATTORNEY SERVICE  
INCORPORATED

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PLAINTIFF: Pupp  
VS.  
DEFENDANT: Becerra

COURT: USDC  
JUDICIAL DIST: Southern  
CITY: Santa Ana

CASE #: 17-00746

APPROVED DIRECT BILLING:  
CARRIER NAME:  
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CITY, STATE, & ZIP:

ADJUSTER:  
INSURED:  
CLAIM NUMBER:  
DATE OF LOSS:

30 APR '19 AM 10:36

LIST ALL DOCUMENTS: HEARING DATE FEES PAID/ DATE FEES ATTACHED

- 1 Notice of Errata
- 2 Stmt of Uncontroverted facts
- 3. Memo of P & A's

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