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C.D. Michel – S.B.N. 144258
Scott M. Franklin – S.B. N. 240254
Sean A. Brady – S.B.N. 262007
MICHEL & ASSOCIATES, P.C.
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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

DAVID GENTRY, JAMES PARKER,
MARK MIDLAM, JAMES BASS, and
CALGUNS SHOOTING SPORTS
ASSOCIATION,

Plaintiffs and Petitioners,

v.

XAVIER BECERRA, in His Official
Capacity as Attorney General For the State
of California; STEPHEN LINDLEY, in
His Official Capacity as Acting Chief for
the California Department of Justice,
BETTY T. YEE, in Her Official Capacity
as State Controller, and DOES 1 - 10,

Defendants and Respondents.

Case No. 34-2013-80001667

**PLAINTIFFS' NOTICE OF MOTION TO
COMPEL ADDITIONAL RESPONSES TO
SPECIAL INTERROGATORIES (SET FOUR)
PROPOUNDED ON DEFENDANTS XAVIER
BECERRA AND STEPHEN LINDLEY**

Hearing Date: November 3, 2017
Hearing Time: 9:00 a.m.
Judge: Honorable Michael P. Kenny
Dept.: 31

Trial Date: March 16, 2018
Action Filed: October 16, 2013

PLEASE TAKE NOTICE that on November 3, 2017 at 9:00 a.m. or as soon thereafter as
the matter may be heard, in Department 31 of the Sacramento County Superior Court, located at
720 9th Street, Sacramento, CA 95814, Plaintiffs/Petitioners David Gentry, James Parker, Mark
Midlam, James Bass, and Calguns Shooting Sports Association (collectively "Plaintiffs") will and
hereby do move this Court for an order granting Plaintiffs' Motion to Compel Additional
Responses to Special Interrogatories, Set Four, Propounded on Defendants/Respondents Xavier

FILED/ENDORSED
OCT 12 2017
By: M. Rubalcaba
Deputy Clerk

1 Becerra and Stephen Lindley (collectively "Defendants").

2 This Motion is brought pursuant to Code of Civil Procedure sections 2030.220,
3 subdivision (a), and 2030.300, subdivisions (a)(1) and (a)(3), on the grounds that Defendants have
4 provided interrogatory responses that include unfounded objections and statements that are
5 evasive and incomplete. A declaration in conformance with Code of Civil Procedure section
6 2016.040 is provided herewith.

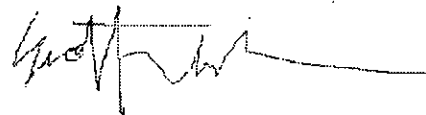
7 This Motion is based upon this notice, the attached memorandum of points and
8 authorities, the supporting Declaration of Scott M. Franklin, the separate statement of disputed
9 issues concurrently served and filed with this Motion, all papers and pleadings currently on file
10 with the Court, and such oral and documentary evidence as may be presented to the Court at the
11 time of the hearing.

12 Please take further notice that
13 [p]ursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the
14 merits of this matter by 2:00 p.m., the court day before the hearing. The complete
15 text of the tentative rulings for the department may be downloaded off the
16 court's website. If the party does not have online access, they may call the
17 dedicated phone number for the department as referenced in the local telephone
18 directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before
19 the hearing and receive the tentative ruling. If you do not call the court and the
20 opposing party by 4:00 p.m. the court day before the hearing, no hearing will be
21 held.

18 Sac. Super. Ct. L.R. 106(A).

20 Dated: October 12, 2017

MICHEL & ASSOCIATES, P.C.



Scott M. Franklin
Attorney for Plaintiffs

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PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Blvd., Suite 200, Long Beach, CA 90802.

On October 12, 2017, the foregoing document described as

**PLAINTIFFS' NOTICE OF MOTION TO COMPEL ADDITIONAL
RESPONSES TO SPECIAL INTERROGATORIES (SET FOUR)
PROPOUNDED ON DEFENDANTS XAVIER BECERRA AND STEPHEN LINDLEY**

on the interested parties in this action by placing .

- the original
- a true and correct copy

thereof enclosed in sealed envelope(s) addressed as follows:

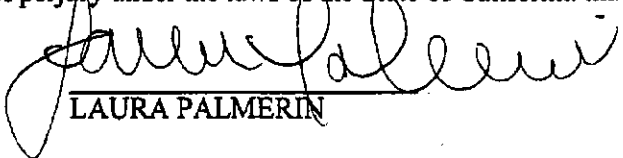
Anthony R. Hakl
Deputy Attorney General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550

Attorney for Defendants

(BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic transmission. Said transmission was reported and completed without error. Executed on October 12, 2017, at Long Beach, California.

(BY MAIL) As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit. Executed on October 12, 2017, at Long Beach, California.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


LAURA PALMERIN

RECEIVED
IN DROP BOX

2017 OCT 12 PM 4:40

DOWNTOWN COURTHOUSE
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

10/12/17