

BY FAX

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

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

13 Plaintiffs and Petitioners,

14 v.

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

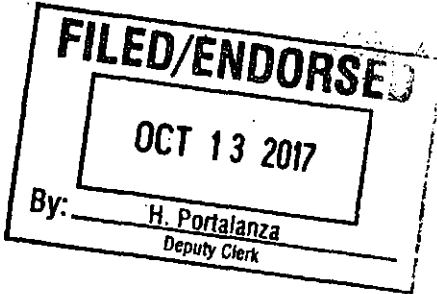
20 Defendants and Respondents.

Case No. 34-2013-80001667

**DECLARATION OF SCOTT M. FRANKLIN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR SANCTIONS RE: DEEENDANTS'
RESPONSES TO REQUESTS FOR
ADMISSIONS (SET THREE) 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

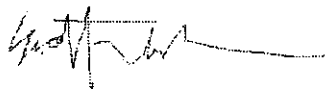
Trial Date: March 16, 2018
Action Filed: October 16, 2013



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8. Based on the information above, Plaintiffs seek sanctions in the amount of \$7,458, or, if there is an award of sanctions fully compensating Plaintiffs' travel time and travel expenses arising out of Defendants' improper response to Plaintiffs' Special Interrogatories (Set Four), then the amount of sanctions sought on the instant matter is \$4,810.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, and that this Declaration was executed on October 13, 2017, in Glendale, California.



Scott M. Franklin
Declarant

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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 13, 2017, the foregoing document described as

DECLARATION OF SCOTT M. FRANKLIN IN SUPPORT OF PLAINTIFFS' MOTION FOR SANCTIONS RE: DEEENDANTS' RESPONSES TO REQUESTS FOR ADMISSIONS (SET THREE) PROPOUNDED ON DEFENDANTS XAVIER BECERRA AND STEPHEN LINDLEY

on the interested parties in this action by placing

- the original
- a true and correct copy

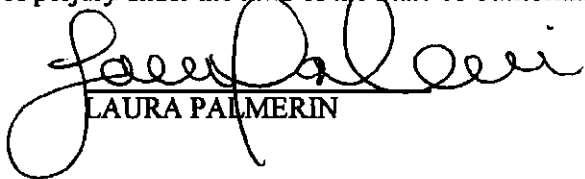
thereof enclosed in sealed envelope(s) addressed as follows:

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 13, 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 13, 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