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Scott M. Franklin – S.B. N. 240254  
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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

**DECLARATION OF SCOTT M. FRANKLIN  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR SANCTIONS RE: DEEENDANTS'  
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

FILED  
ENDORSED

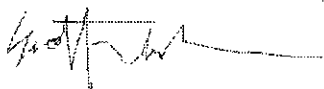
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GDSSC COURTHOUSE  
SUPERIOR COURT  
OF CALIFORNIA  
SACRAMENTO COUNTY



1           8.       Based on the information above, Plaintiffs seek sanctions in the amount of \$5,383,  
2 or, if there is an award of sanctions that fully compensates Plaintiffs for travel attorney time and  
3 travel expenses arising out of Defendants' improper response to Plaintiffs' Requests for  
4 Admissions (Set Three), then the amount of sanctions sought on the instant matter is \$2,735.

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

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10 \_\_\_\_\_  
11 Scott M. Franklin  
12 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 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:

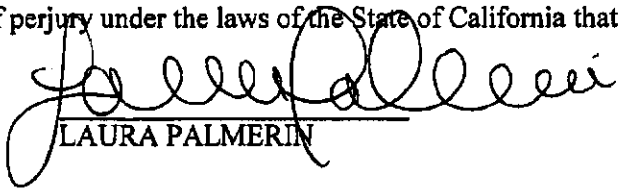
Anthony R. Haki  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550

*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