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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 NATIONAL RIFLE ASSOCIATION
15 OF AMERICA; JOHN DOE,

16 Plaintiffs,

17 vs.

18 CITY OF LOS ANGELES; ERIC
19 GARCETTI, in his official capacity as
20 Mayor of City of Los Angeles; HOLLY
21 L. WOLCOTT, in her official capacity
22 as City Clerk of City of Los Angeles;
23 and DOES 1-10,

24 Defendants.

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

**PLAINTIFFS’ EXHIBIT LIST [L.R.
16-6.1]**

Pretrial Conference: February 10, 2020

Time: 3:00 p.m.

Courtroom: 10A

Judge: Hon. Judge Stephen V. Wilson

Action Filed: April 24, 2019

Trial: February 25, 2020

1 In accordance with Rule 26(a)(3)(A)(iii), Local Rule 16-6.1, and this Court's
 2 Civil Trial Preparation Order (Dkt. 37), Plaintiffs National Rifle Association of
 3 America and John Doe hereby submit the following Exhibit List, including those
 4 exhibits that may be used at trial other than those contemplated to be used solely for
 5 impeachment.

6 Case Title: *National Rifle Association of America, et al. v. City of Los Angeles*

7 Case No.: 2:19-cv-03212

No	Description	Date Identified	Date Admitted
1	City Ordinance No. 183806, dated July 28, 2015, and approved August 7, 2015		
2	City Ordinance No. 183956, dated October 27, 2015, and approved on November 6, 2015		
3	Official Action of the Los Angeles City Council re: FedEx contract, dated April 11, 2018		
4	City Budget and Finance Committee Motion from Committee Member and City Council member Mitch O'Farrell, dated March 28, 2018		
5	City Budget and Finance Committee Motion by Committee Member and City Council Member Mitch O'Farrell, stamped September 21, 2018		
6	City Budget and Finance Committee Report, File No. 18-0896, dated October 10, 2018		
7	Official Action of the Los Angeles City Council, Council File No. 18-0896, Adoption of Budget and Finance Committee Report and vote count from City Council meeting on October 10, 2018		
8	City Ordinance No. 186000, dated February 12, 2019, and approved February 18, 2019		
9	Letter from David Michaelson, Chief Assistant City Attorney to the City Council, Report No. R19-0017, dated January 18, 2019		
10	Letter from David Michaelson, Chief Assistant		

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	City Attorney, Report No. RSO-0019 Re: Draft Ordinance Repealing Section 10.52 of Article 26, Chapter 1 of the Los Angeles Administrative Code Requiring Disclosure of Contracts and Sponsorship of the National Rifle Association, dated January 9, 2020		
11	Draft Ordinance No. ____ (Yet to Be Determined by City) Repealing Section 10.2 of Article 26, Chapter 1 of the Los Angeles Administrative Code, approved as to form and legality by David Michaelson, Chief Assistant City Attorney on January 9, 2020		
12	City of Los Angeles Budget and Finance Committee Agenda for January 13, 2020, Including Item Concerning City Council File No. 18-0896		
13	City Budget and Finance Committee Report, File No. 18-0896, dated January 13, 2020		
14	Los Angeles City Council Agenda for January 21, 2020, Including Items Concerning City Council File No. 18-0896		
15	Los Angeles City Council File Management System Landing Page for Council File 18-0896, available at https://cityclerk.lacity.org/m.clerkconnect/#CFIRresult&ui-state=dialog (last accessed Jan. 21, 2020)		
16	NRA.org, "A Brief History of the NRA," available at https://home.nra.org/about-the-nra		
17	"Find an NRA Training Course Near You," available at https://www.nrainstructors.org/Search.aspx		
18	NRA.org, "NRA Membership Information," available at https://membership.nra.org/FAQ		
19	"About the NRA Institute for Legislative Action" available at https://www.nraila.org		
20	NRA.org, "NRA Member Benefits," available at https://benefits.nra.org/		

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21	NRAblog.com, <i>Why I Joined the NRA</i> , dated January 5, 2016, available at https://www.nrablog.com/articles/2016/1/why-i-joined-the-nra/		
22	Kim Parker, et al., <i>America's Complex Relationship with Guns: An In-depth Look at the Attitudes and Experiences of U.S. Adults</i> , Pew Research Center Report, dated June 22, 2017		
23	Christian Britschgi, <i>California Politicians Propose Government Boycotts of Companies that Do Business With the NRA</i> , Reason, dated March 29, 2018, available at https://reason.com/2018/03/29/california-politicians-urge-boycott-of-c/		
24	Matt Ford, <i>Andrew Cuomo's Trumpian War on the NRA</i> , New Republic, dated August 28, 2018, available at https://newrepublic.com/article/150933/andrew-cuomos-trumpian-war-nra		
25	Jeremy Stahl, <i>The NRA's Business Affiliates Are Dropping Like Flies</i> , Slate.com, dated February 24, 2018, available at https://slate.com/news-and-politics/2018/02/the-nras-business-affiliates-are-dropping-like-flies.html		
26	Ivan Livingston, <i>These 3,100 Businesses Love The NRA Even as Others Pull Back</i> , Chic. Trib., dated March 12, 2018, available at https://www.chicagotribune.com/business/ct-biz-pro-nra-businesses-20180312-story.html		
27	Jacob Sullum, <i>Andrew Cuomo's Unconstitutional Assault on the NRA</i> , Reason, dated November 7, 2018, available at https://reason.com/2018/11/07/andrew-cuomos-unconstitutional-assault-o/		
28	NRA Institute for Legal Action, <i>Shopify Targets Law-Abiding Firearm Businesses</i> , dated August 17, 2018, available at https://www.nraila.org/articles/20180817/shopify-targets-law-abiding-firearm-businesses		
29	Brad Tuttle, <i>Apple, Amazon, and More Companies Facing Boycotts Over Ties to the NRA</i> , Money.com, dated February 26, 2018, available at http://money.com/money/		

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	5176783/nra-boycott-fedex-amazon-apple-gun-control-youtube/		
30	Megan Friedman, <i>These Companies Still Do Business With the NRA, Despite, Well, Everything</i> Esquire, dated February 26, 2018, available at https://www.esquire.com/news-politics/a18700113/companies-that-work-with-the-nra/		
31	Matt Pearce, <i>NRA Stance Lands Airline in Quagmire</i> , L.A. Times, dated February 28, 2018.		
32	Emily Alpert Reyes, <i>L.A. Councilman Wants City to Boycott Companies with NRA Ties</i> , L.A. Times, dated March 28, 2018, available at https://www.latimes.com/local/lanow/la-me-ln-nra-city-20180328-story.html		
33	<i>First Reports Evaluating the Effectiveness of Strategies for Preventing Violence: Firearm Laws</i> , Center for Disease Control, dated October 3, 2003		
34	Public Social Media Posts on the Verified Twitter Account of Los Angeles City Councilmember Mitch O'Farrell Concerning the National Rifle Association		
35	Public Social Media Posts on the Verified Twitter Account of Los Angeles Mayor Eric Garcetti Concerning the National Rifle Association		
36	Open letter from Los Angeles City Councilmember Mitch O'Farrell Re: Adoption of Section 10.52 of Article 26 Chapter 1 of the Los Angeles Administrative Code		
37	*Letter from counsel for Plaintiffs, Michel & Associates, P.C. to the City of Los Angeles, dated May 21, 2019, requesting documents pursuant to California's Public Records Act		
38	*Letter from Patricia Fuellas, Contract Compliance Analyst, City of Los Angeles Public Works, Bureau of Contract Administration, dated May 23, 2019, responding to letter from counsel for Plaintiffs, Michel & Associates, P.C., dated May 21, 2019, requesting documents pursuant to		

1		California's Public Records Act		
2	39	*Disclosure to the City of Los Angeles Re: NRA Contract by Verizon Wireless with accompanying email		
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4	40	*Disclosure to the City of Los Angeles Re: NRA Contract by Louis Brisbois Bisgaard & Smith, LLP		
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6	41	*Disclosure to the City of Los Angeles Re: NRA Contract by EyeMed with accompanying email		
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8	42	*Disclosure to the City of Los Angeles Re: NRA Contract by West Publishing Corporation and with accompanying email		
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10	43	*Disclosure to the City of Los Angeles Re: NRA Contract by Umarex USA and accompanying email		
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12	44	*Disclosure to the City of Los Angeles Re: NRA Contract by CBRE, Inc. and accompanying email		
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14	45	*Quality Uptown Services disclosure form and accompanying email		
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16	46	*Comments submitted to the Los Angeles City Council, dated October 20, 2018, from the Studio City Neighborhood Council Opposing Adoption of Section 10.52 of Article 26 Chapter 1 of the Los Angeles Administrative Code		
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19 On January 21, 2020, the deadline to file this exhibit list per the local rules,
20 the Los Angeles City Council voted unanimously to repeal the ordinance that
21 Plaintiffs challenge in this action, potentially altering the landscape of this litigation
22 in a significant way. Plaintiffs are still determining how the imminent repeal would
23 impact this litigation and how that might affect the evidence presented.

24 Additionally, discovery is ongoing. Plaintiff NRA propounded on Defendant
25 City written discovery in the form of Requests for Production of Documents on
26 January 9, 2020, seeking documents Plaintiff NRA believes are important to proving
27 its claims in this matter. Responses to those discovery requests are due on February
28 11, 2020.

1 For these reasons, Plaintiffs reserve the right to amend this exhibit list should
2 they acquire any document relevant to their claims from the City's responses to
3 Plaintiff NRA's discovery or resulting from the City's process to repeal the
4 ordinance being challenged in this matter.

5 Dated: January 21, 2020

MICHEL & ASSOCIATES, P.C.

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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' EXHIBIT LIST

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 January 21, 2020.

s/ Laura Palmerin

Laura Palmerin