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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’ WITNESS LIST

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

25 PLEASE TAKE NOTICE pursuant to Rule 26(a)(3)(A) of the Federal Rules
26 of Civil Procedure and Local Rule 16-5, Plaintiffs National Rifle Association of
27 America and John Doe submit this list of witnesses intends to call at trial.

28 1. Plaintiff John Doe. Plaintiffs will be filing a motion for protective order
and to proceed under a pseudonym imminently. Plaintiff Doe can be contacted
through Plaintiffs’ counsel of record.

2. Los Angeles City Councilmember Mitch O’Farrell. 200 N. Spring

1 Street, Room 480, Los Angeles, CA 90012. Phone: (213) 473-7013. Mr. O’Farrell
2 can be contacted through Defendants’ counsel of record.

3 3. *Los Angeles City Councilmember Paul Krekorian. 200 N. Spring
4 Street, Room 435, Los Angeles, CA 90012. Phone: (213) 473-7002. Mr. Krekorian
5 can be contacted through Defendants’ counsel of record.

6 As required by Rule 26(a)(3)(A)(i) of the Federal Rules of Civil Procedure
7 and Local Rule 16-5, any person that may be called “if the need arises” is designated
8 with an asterisk.

9 On January 21, 2020, the deadline to file this witness list per the local rules,
10 the Los Angeles City Council voted unanimously to repeal the ordinance that
11 Plaintiffs challenge in this action, potentially altering the landscape of this litigation
12 in a significant way. Plaintiffs are still determining how the imminent repeal would
13 impact this litigation and how that might affect the evidence presented.

14 Additionally, discovery is ongoing. Plaintiff NRA propounded on Defendant
15 City written discovery in the form of Requests for Production of Documents on
16 January 9, 2020, seeking documents Plaintiff NRA believes are important to proving
17 its claims in this matter. Responses to those discovery requests are due on February
18 11, 2020.

19 For these reasons, Plaintiffs reserve the right to amend this witness list should
20 they learn of any document identifying a relevant witness for their claims from the
21 City’s responses to Plaintiff NRA’s discovery or from the City’s process to repeal
22 the ordinance being challenged in this matter.

23
24 Dated: January 21, 2020

MICHEL & ASSOCIATES, P.C.

25
26 s/ Anna M. Barvir
27 Anna M. Barvir
28 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' WITNESS 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