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11 Attorneys for Plaintiffs

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

14 NATIONAL RIFLE ASSOCIATION OF  
15 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 as  
22 City Clerk of City of Los Angeles; and  
23 DOES 1-10,

24 Defendants.

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

**NOTICE OF SETTLEMENT AND  
REQUEST TO VACATE  
PRETRIAL AND TRIAL DATES**

Hon. Judge Stephen V. Wilson  
Courtroom 10A

1 Plaintiffs file this Notice of Settlement and Request to Vacate Pretrial and  
2 Trial Dates because the parties have reached a settlement in this litigation per their  
3 recently filed Stipulation and [Proposed] Stipulated Judgment. (ECF No. 45.)  
4 Accordingly, Plaintiffs wish to notify the Court that trial will no longer be necessary,  
5 and this Court is free to vacate the upcoming pre-trial conference and trial dates.

6 **WHEREAS,**

7 On December 11, 2019, the Court granted Plaintiffs' motion for preliminary  
8 injunction, ruling that Plaintiffs were likely to succeed in showing that Defendant  
9 City of Los Angeles's ordinance mandating disclosure by city contractors of any  
10 sponsorship of or contract with Plaintiff National Rifle Association ("NRA")  
11 violates their First Amendment rights, and enjoining the City from enforcing the  
12 ordinance while this case proceeded.

13 Following the Court's ruling, the City repealed, and Plaintiffs are satisfied that  
14 the City cannot and shall not re-enact, the successfully challenged NRA disclosure  
15 ordinance.

16 The parties have agreed to the entry of a stipulated final Judgment of  
17 Permanent Injunction incorporating the Court's December 11th order of preliminary  
18 injunction. The City will thereby be permanently enjoined from mandating  
19 disclosure by city contractors of any sponsorship of or contract with Plaintiff  
20 National Rifle Association ("NRA") that violates their First Amendment rights.

21 Plaintiffs are satisfied that, being bound by a final Judgment of Permanent  
22 Injunction incorporating the Court's December 11th order of preliminary injunction,  
23 the City will not and cannot attempt to enact any substantially similar measure  
24 unlawfully suppressing the message and political speech of NRA or its members,  
25 sponsors, or business partners.

26 The City has agreed to remove the NRA disclosure requirement established by  
27 the repealed ordinance, and all references thereto, from all City forms. Indeed,  
28 Plaintiffs understand that the City's Bureau of Contract Administration has already

1 removed the NRA disclosure requirement from the Disclosure Affidavit on Los  
2 Angeles Business Assistance Virtual Network (“LABAVN”).

3 The City has committed to notify in writing each contractor who submitted a  
4 disclosure form to the City containing the NRA disclosure requirement that the NRA  
5 disclosure ordinance has been repealed, that they are no longer under any duty to  
6 comply with the NRA disclosure requirement, and that they need not make any such  
7 disclosures in the future.

8 The City has provided written notification to all City departments, employees,  
9 and vendors charged with implementing, administering, or enforcing the ordinance  
10 that the ordinance has been repealed in its entirety, that the Ordinance is no longer  
11 enforceable, that the NRA disclosure requirement cannot be and shall no longer be  
12 enforced.

13 The parties have agreed that Plaintiffs are entitled to recover attorneys’ fees  
14 and costs. The amount the City shall pay to Plaintiffs will be determined by good  
15 faith negotiation between the parties or through a noticed motion for attorneys’ fees  
16 and application to tax costs before this Court.

17 **THEREFORE,**

18 Plaintiffs request that, once the Court approves the parties’ January 31, 2020  
19 stipulation (ECF Nos. 45 & 45-1), all pending discovery and pre-trial deadlines be  
20 vacated and the pre-trial conference set for February 10, 2020 and the trial set for  
21 February 25, 2020 be taken off calendar.

23 Dated: January 31, 2020

**MICHEL & ASSOCIATES, P.C.**

25 *s/ C.D. Michel*  
26 C.D. Michel  
27 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:

**NOTICE OF SETTLEMENT AND REQUEST TO  
VACATE PRETRIAL AND TRIAL DATES**

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  
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Los Angeles, CA 90012  
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*Attorneys for Defendants*

I declare under penalty of perjury that the foregoing is true and correct.

Executed January 31, 2020.

*s/ Laura Palmerin*  
\_\_\_\_\_  
Laura Palmerin