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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JANICE ALTMAN, *et al.*,  
Plaintiffs,

vs.

COUNTY OF SANTA CLARA,  
CALIFORNIA, *et al.*,

Defendants.

Case No. 4:20-cv-02180-JST

**DECLARATION OF JOSH SAVANI IN  
SUPPORT OF PLAINTIFFS'  
APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND  
ISSUANCE OF PRELIMINARY  
INJUNCTION**

**DECLARATION OF JOSH SAVANI**

I, Josh Savani, declare as follows:

1. I am the Director of Research and Information of the National Rifle

- Association of America, Inc. (“NRA”).
2. NRA is a 501(c)(4) nonprofit corporation organized under the laws of the State of New York with its principal place of business in Fairfax, Virginia.
  3. NRA has over 5 million members and supporters nationwide, including in the counties of Santa Clara, Alameda, San Mateo, and Contra Costa, and across the State of California. These members include Plaintiff Altman.
  4. In Accordance with Article II of the NRA’s bylaws, the NRA’s purposes and objectives include “To protect and defend the Constitution of the United States, especially with reference to the God-given inalienable right of the individual American citizen guaranteed by such Constitution to acquire, possess ... transfer ownership of, and enjoy the right to use, keep and bear arms, in order that the people may exercise their individual rights of ... defense of family, person, and property.”
  5. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’ members and customers, and other similarly situated individuals would exercise the fundamental human right to acquire, keep, bear, and practice proficiency training and shooting with arms – including firearms, ammunition, magazines, and appurtenances – for lawful purposes including self-defense, and would do so, but for fear of liability and prosecution under Defendants’ laws, orders, policies, practices, customs, and enforcement actions.
  6. NRA has and continues to expend and divert resources, and has been and

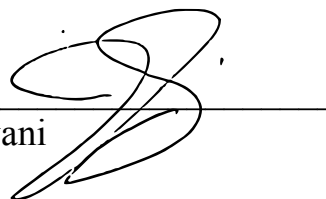
continues to be adversely and directly harmed, because of Defendants' laws, policies, orders, practices, customs, and enforcement actions.

7. Accordingly, and for reasons set forth in Plaintiffs' application and motion, I respectfully ask this Court to grant the application and/or motion for preliminary injunction.

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

Executed on April 9, 2020.

Josh Savani

A handwritten signature in black ink, appearing to be 'Josh Savani', written over a horizontal line. The signature is stylized with loops and a long tail.