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

18 JANICE ALTMAN, *et al.*,
19 Plaintiffs,

20 vs.

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

23 Defendants.

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

24 **DECLARATION OF RYAN**
25 **GOODRICH IN SUPPORT OF**
26 **PLAINTIFFS' APPLICATION FOR**
27 **TEMPORARY RESTRAINING ORDER**
28 **AND ISSUANCE OF PRELIMINARY**
INJUNCTION

DECLARATION OF RYAN GOODRICH

I, Ryan Goodrich, declare as follows:

1. I am an adult resident of the County of Contra Costa, California, and am a named plaintiff in the above matter. I have personal knowledge of the facts

1 stated herein, and if called as a witness, I could competently testify to these
2 facts.

3
4 2. This declaration is executed in support of Plaintiffs' Motion for Temporary
5 Restraining Order and Issuance of Preliminary Injunction.

6
7 3. I am not prohibited from possessing firearms or ammunition under federal and
8 state law.

9
10 4. In light of the developing situation involving the spread of COVID-19, I
11 became concerned about my ability to protect myself and my family. As such,
12 I desire to obtain ammunition for self-defense and other purposes.

13
14 5. Additionally, I am employed as an armored truck driver. This employment
15 status makes me an essential worker pursuant to the Contra Costa County Stay
16 at Home Order. I also require firearms and ammunition for the execution of
17 this employment. I cannot acquire the ammunition I need for my job because
18 all of the gun shops in Contra Costa County are prohibited from making any
19 ammunition sales under the current Order.
20

21
22 6. I possess a firearms safety certificate ("FSC") as required by the State of
23 California in order to purchase or acquire a firearm.

24
25 7. Unlike individuals in other states, I cannot lawfully purchase ammunition
26 online and have it shipped directly to my home.

27
28 8. Unlike other constitutionally protected products that can be purchased online

1 and shipped directly to me, under federal and state law, I cannot purchase a
2 firearm online and have it shipped to my home.

3
4 9. In order for me to comply with federal and State law, I can only acquire and
5 take possession of firearms in a face to face transaction at a duly licensed
6 firearm retailer.

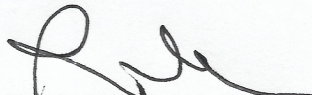
7
8 10. In order for me to comply with California law, I can only acquire and take
9 possession of ammunition in a face to face transaction at a licensed firearm
10 and ammunition vendor. Defendants' Orders and actions have resulted in
11 firearm and ammunition stores being closed in the County of Contra Costa,
12 California.

13
14 11. I want to exercise my right to acquire, keep, bear, and practice proficiency
15 training and shooting with arms – including firearms, ammunition, magazines,
16 and appurtenances – for lawful purposes including self-defense, and would do
17 so, but for the reasonable and imminent fear of arrest and criminal prosecution
18 under Defendants' laws, policies, orders, practices, customs, and enforcement.

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21
22 12. Accordingly, and for reasons set for in Plaintiffs' application and motion, I
23 respectfully ask this Court to grant the application and/or motion for
24 preliminary injunction.
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26 I declare under penalty of perjury that the foregoing is true and correct. Executed
27 on April 9, 2020.
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Ryan Goodrich