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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT**

TURNER’S OPERATIONS, INC., a California corporation; TRADERS LOAN AND JEWELRY, INC., a California corporation; FFLGuard, LLC, a Delaware limited liability company; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED, a California corporation,

Petitioners-Plaintiffs,

v.

ERIC GARCETTI, in his official capacity as Mayor of the City of Los Angeles; MICHAEL N. FEUER, in his official capacity as City Attorney of the City of Los Angeles; MICHAEL MOORE, in his official capacity as Chief of the Los Angeles Police Department; CITY OF LOS ANGELES; and DOES 1-25,

Respondents-Defendants.

Case No.: 20STCP01258

[PROPOSED] ORDER GRANTING EX PARTE APPLICATION TO STAY ENFORCEMENT OF LOS ANGELES ORDER REQUIRING LICENSED FIREARM DEALERS TO CLOSE OR ALTERNATIVELY, FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE

Hearing Date: April 13, 2020
Hearing Time: 8:30 a.m.
Department: 1

Action Filed: April 3, 2020

1 **TO ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 The ex parte application of Petitioners-Plaintiffs Turner’s Operations, Inc., Traders
3 Loan and Jewelry, Inc., FFLGuard, LLC, and California Rifle & Pistol Association,
4 Incorporated, for an Order to stay enforcement of the City of Los Angeles’ Order requiring
5 licensed firearm dealers and/or licensed ammunition vendors to close or alternatively, for
6 temporary restraining order and order to show cause came on for hearing in Department 1 of
7 this Court on April 13, 2020 at 8:30 a.m.

8 Having read the *ex parte* application, the memoranda and the declarations filed by the
9 parties, having heard argument of counsel, and good cause shown the Court hereby ORDERS
10 as follows:

11 Petitioners-Plaintiffs’ *ex parte* application to stay enforcement of the City of
12 Los Angeles’ Order requiring licensed firearm dealers to close is GRANTED.

13 Petitioners-Plaintiffs’ *ex parte* application for a temporary restraining order
14 enjoining enforcement of the City of Los Angeles’ Order requiring licensed firearm dealers
15 to close is GRANTED.

16 **ORDER TO SHOW CAUSE**

17 To Respondents-Defendants Eric Garcetti, in his official capacity as Mayor of the City of
18 Los Angeles, Michael N. Feuer, in his official capacity as City Attorney of the City of Los
19 Angeles, Michael Moore, in his official capacity as Chief of the Los Angeles Police Department,
20 and the City of Los Angeles:

21 Based upon the Petition for Writ of Mandate and/or Prohibition or Other Appropriate
22 Relief; Complaint for Declaratory and Injunctive Relief filed in this action, you are ordered to
23 appear on _____ (date), at _____ (time) in Department ____ of this Court located at
24 111 North Hill Street, Los Angeles, California 90012, to show cause why a preliminary injunction
25 should not be ordered prohibiting you, your employees, agents, or any persons acting with you or
26 on your behalf, from enforcing the City of Los Angeles’ Order requiring licensed firearm dealers
27 to close, during the pendency of this action.

28 This Order to Show Cause and supporting papers shall be served on Respondents-

1 Defendants no later than _____, 2020, by _____ (manner of service). Proof of
2 such service shall be filed and delivered to the court hearing the Order to Show Cause no later
3 than _____, 2020. Any reply papers shall be filed and served by Respondents-
4 Defendants on _____ (manner of service), no later than _____ (time) on _____,
5 2020.

6 **TEMPORARY RESTRAINING ORDER**

7 Pending hearing on the above Order to Show Cause, Respondents-Defendants, their
8 employees, agents, and/or any other persons acting with them or on their behalf, are restrained
9 and enjoined from enforcing the City of Los Angeles' Order requiring licensed firearm dealers to
10 close until this Court hears and rules upon the Order to Show Cause.

11 The Court reserves jurisdiction to modify or dissolve this Order as may be required
12 by the interests of justice.

13 IT IS SO ORDERED.

14
15 Dated: _____
16 _____
17 Judge of the Superior Court
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County,
5 California. I am over the age eighteen (18) years and am not a party to the within action. My
6 business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

7 On April 10, 2020, I served the foregoing document(s) described as

8 **[PROPOSED] ORDER GRANTING E EX PARTE APPLICATION TO STAY
9 ENFORCEMENT OF LOS ANGELES ORDER REQUIRING LICENSED FIREARM
10 DEALERS TO CLOSE OR ALTERNATIVELY, FOR TEMPORARY RESTRAINING
11 ORDER AND ORDER TO SHOW CAUSE**

12 on the interested parties in this action by placing
13 [] the original
14 [X] a true and correct copy
15 thereof by the following means, addressed as follows:

16 Benjamin F. Chapman, Deputy City Attorney
17 Email: benjamin.chapman@lacity.org
18 Jonathan H. Eisenman, Deputy City Attorney
19 Email: jonathan.eisenman@lacity.org
20 200 North Main Street, 7th Floor, City Hall East
21 Los Angeles, CA 90012
22 Fax No.: (213) 978-0763

23 _____ (BY MAIL) As follows: I am “readily familiar” with the firm’s practice of collection and
24 processing correspondence for mailing. Under the practice it would be deposited with the
25 U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach,
26 California, in the ordinary course of business. I am aware that on motion of the party
27 served, service is presumed invalid if postal cancellation date is more than one day after
28 date of deposit for mailing an affidavit.

_____ X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic
transmission to the emails shown above. Said transmission was reported and completed
without error.

_____ X (BY FAX) As follows: I transmitted a true and correct copy to the facsimile number
shown above. Said transmission was reported and completed without error.

_____ X (STATE) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

Executed on April 10, 2020, at Long Beach, California.



Laura Palmerin