1 2 3 4 5 6	C.D. Michel – SBN 144258 Sean A. Brady – SBN 262007 Matthew D. Cubeiro – SBN 291519 MICHEL & ASSOCIATES, P.C. 180 E. Ocean Blvd., Suite 200 Long Beach, CA 90802 Telephone: (562) 216-4444 Facsimile: (562) 216-4445 Email: cmichel@michellawyers.com Attorneys for Petitioners-Plaintiffs	
8	IN THE SUPERIOR COURT OF	F THE STATE OF CALIFORNIA
9	FOR THE COUNTY OF LOS ANGELES	
10	CENTRAL DISTRICT	
11		
12	TURNER'S OPERATIONS, INC., a California corporation; TRADERS LOAN	Case No.: 20STCP01258
13	AND JEWELRY, INC., a California corporation; FFLGuard, LLC, a Delaware	EX PARTE APPLICATION OF PETITIONER TURNER'S OPERATIONS,
14	limited liability company; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED, a California corporation,	INC. FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE
15	•	Hearing Date: April 28, 2020
16	Petitioners-Plaintiffs,	Hearing Time: 8:30 a.m. Department: 1
17	V.	Action Filed: April 3, 2020
18	ERIC GARCETTI, in his official capacity as Mayor of the City of Los Angeles;	
19	MICHAEL N. FEUER, in his official capacity as City Attorney of the City of Los Angeles; MICHAEL MOORE, in his official	
20	capacity as Chief of the Los Angeles Police Department; CITY OF LOS ANGELES; and	
21	DOES 1-25,	
22	Respondents-Defendants.	
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EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE

Pursuant to sections 525, 526, and 527 of the Code of Civil Procedure, rules 3.1150 and 3.1200 et seq. of the California Rules Court, and rule 3.4, subdivision (f) of the Local Rules for the Superior Court of Los Angeles, Plaintiff-Petitioner Turner's Operations, Inc., by and through their counsel of record, apply ex parte for an order temporarily enjoining Defendants-Respondents the City of Los Angeles, Mayor Eric Garcetti, Los Angeles Police Department Chief Michael Moore, Los Angles City Attorney Michael Feuer, their employees, agents, and persons acting with them on their behalf (collectively "Defendants" or "Respondents" or "the City"), from enforcing the Mayor's "Safer at Home" order against Petitioner Turner's during the pendency of this action.

Plaintiff-Petitioner Turner's also requests that the Court issue an Order to Show Cause, affording Defendants-Respondents the opportunity to appear and show cause why a preliminary injunction should not issue restraining and enjoining them from enforcing the Mayor's "Safer at Home" order against Petitioner Turner's for the remainder of this litigation.

This application is based on California Code Civil Procedure sections 525, 526, and 527, California Rules of Court, rules 3.1150 and 3.1200 et seq., and Los Angeles Superior Court rule 3.4, subdivision (f), on the grounds that: (1) Plaintiff-Petitioner Turner's is likely to succeed on the merits of its claims that Defendants-Respondents' enforcement of the Mayor's "Safer at Home" order against Petitioner is invalid because Turner's is exempt from that order by its very terms; (2) Plaintiff-Petitioner Turner's will suffer immediate threat of irreparable harm unless enforcement of such order is stayed by this Court; and (3) the balance of hardships tips in Plaintiff-Petitioner's favor.

This application is further based on the Memorandum of Points and Authorities attached hereto, the supporting declarations and evidence filed concurrently herewith, the First Amended Petition for Writ of Mandate and/or Prohibition or Other Appropriate Relief; Complaint for Declaratory and Injunctive Relief, and upon such further evidence and argument as may be presented before or at the time of hearing on the motion.

On April 21, 2020, Plaintiff-Petitioner provided all Defendants-Respondents, through their counsel named in a related matter and others known to counsel for Petitioners as counsel for the City, including Deputy City Attorneys Jonathan H. Eisenman and Benjamin Chapman, with electronic mail notice of their intention to seek ex parte relief. (Decl. of Sean A. Brady Supp. Ex Parte Appn. for OSC & TRO ("Brady Decl."), ¶ 4; Ex. C.) Petitioner-Plaintiffs' counsel is informed and believes that Mr. Eisenman and Mr. Chapman's business address is 200 North Main Street, 7th Floor, Los Angeles, California, 90012, their phone number is (213) 473-6858, and email addresses are jonathan.eisenman@lacity.org and benjamin.chapman@lacity.org. Counsel for Respondents, Mr. Eisenman, confirmed via electronic mail on April 21, 2020, that Respondents will oppose this ex parte application. (*Ibid.*) Plaintiff-Petitioner Turner's has made previous application for temporary injunctive relief on different grounds. Dated: April 27, 2020 MICHEL & ASSOCIATES, P.C. Sean A. Brady Attorneys for Petitioners/Plaintiff

1	PROOF OF SERVICE	
2	STATE OF CALIFORNIA COUNTY OF LOS ANGELES	
3	I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.	
4		
5	On April 27, 2020, I served the foregoing document(s) described as	
6	EX PARTE APPLICATION OF PETITIONER TURNER'S OPERATIONS, INC. FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE	
7	on the interested parties in this action by placing	
8	[] the original [X] a true and correct copy	
9	thereof by the following means, addressed as follows:	
10	Benjamin F. Chapman, Deputy City Attorney	
11		
12	Email: jonathan.eisenman@lacity.org 200 North Main Street, 7th Floor, City Hall East	
	Los Angeles, CA 90012	
13	Fax No.: (213) 978-0763	
14 15	processing correspondence for mailing. Under the practice it would be deposited with the	
16	California, in the ordinary course of business. I am aware that on motion of the party	
17	X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic	
18	transmission to the emails shown above. Said transmission was reported and completed without error.	
19	X (STATE) I declare under penalty of perjury under the laws of the State of California that	
20	the foregoing is true and correct.	
21	Executed on April 27, 2020, at Long Beach, California.	
22	Dan La Occión	
23	Janufalein	
24	Laura Palmerin	
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