

1 C.D. Michel – SBN 144258
Sean A. Brady – SBN 262007
2 Matthew D. Cubeiro – SBN 291519
MICHEL & ASSOCIATES, P.C.
3 180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
4 Telephone: (562) 216-4444
Facsimile: (562) 216-4445
5 Email: cmichel@michellawyers.com

6 Attorneys for Petitioners-Plaintiffs

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

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

15 **Petitioners-Plaintiffs,**

16 **v.**

17 ERIC GARCETTI, in his official capacity as
18 Mayor of the City of Los Angeles;
MICHAEL N. FEUER, in his official
19 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.**

Case No.: 20STCP01258

**EX PARTE APPLICATION OF
PETITIONER TURNER’S OPERATIONS,
INC. FOR TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW CAUSE**

Hearing Date: April 28, 2020
Hearing Time: 8:30 a.m.
Department: 1

Action Filed: April 3, 2020

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

12
13 Dated: April 27, 2020

MICHEL & ASSOCIATES, P.C.

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16 _____
17 Sean A. Brady
18 Attorneys for Petitioners/Plaintiff
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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 27, 2020, I served the foregoing document(s) described as

8 **EX PARTE APPLICATION OF PETITIONER TURNER’S OPERATIONS, INC. FOR**
9 **TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE**

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

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

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

27 X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic
28 transmission to the emails 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 27, 2020, at Long Beach, California.



Laura Palmerin