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8	Attorneys for Defendants,	
9	CITY OF LOS ANGELES, ERIC GARCETTI	<i>.</i>
10	MICHEL MOORE, AND MICHAEL N. FEUI	ER
11	IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA	
12	FOR THE COUNTY OF LOS ANGELES	
13		
14	TURNER'S OPERATIONS, INC., et al.,) Case No.: 20STCP01258
15	Petitioners and Plaintiffs,) DECLARATION OF ERIC QUAN IN SUPPORT OF
16	VS.	DEFENDANT CITY OF LOS ANGELES'SOPPOSITION TO PETITIONER'S SECOND EX
17	ERIC GARCETTI, et al.,) PARTE APPLICATION FOR TEMPORARY
18	Respondents and Defendants.) RESTRAINING ORDER AND ORDER TO SHOW) CAUSE
19)
20		Hearing Date: April 28, 2020
21) Hearing Time: 8:30 a.m. Dept.: 1
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DECLARATION OF ERIC QUAN

I, Eric R. Quan declare and state as follows:

- 1. I am a Lieutenant employed by the Los Angeles Police Department as a sworn officer for approximately 25 years. I am currently the Officer in Charge, the Firearms Training Section, Los Angeles Police Department, In-Service Training Division. The Firearms Training Section is responsible for firearms equipment and training for all entry level training and career-long sustainment training of all recruits, in-service and reserve officers. I have personal knowledge of the facts set forth below, and if called as a witness, could and would testify competently thereto.
- 2. In my role, I am intimately familiar with the firearms equipment and ammunition provided by the LAPD to its officers.
- 3. The LAPD supplies its officers with a service weapon and ammunition. The LAPD has a full-time armory for immediate repairs, replacement or loaner weapons in case of damage or repairs.
- 4. If an LAPD officer purchases firearms or ammunition from a store, such purchases are entirely discretionary, voluntary, and are not mandated or required by the LAPD. In other words, public safety is not compromised in any way by a private store's inability to sell firearms or ammunition to an LAPD officer.

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 Los Angeles, California.

Lt. Eric R. Quan

agon & Rec 2 31427

PROOF OF SERVICE

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Turner Operations, Inc. et al. v. Eric Garcetti, et al. LASC Case No. 20STCP01258

3 4 I, Ava Smith, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 200 North Main Street, City Hall East, 6th Floor, Los Angeles, California 90012.

5

On April 28, 2020, I served the foregoing documents described as: **DECLARATION OF ERIC QUAN IN SUPPORT OF DEFENDANT CITY OF LOS ANGELES'S OPPOSITION TO PETITIONER'S SECOND EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE** on the interested parties:

8

C.D. Michel Sean A. Brady

9 | Matthew D. Čubeiro

MICHEL & ASSOCIATES, P.C.

180 E. Ocean Blvd., Suite 200

Long Beach, CA 90802

11 Email: cmichel@michellawyers.com
Email: sbrady@michellawyers.com

12

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[] **BY MAIL** – I am readily familiar with the practice of the Los Angeles City Attorney's Office for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is placed for collection and mailing. On the date referenced above, I placed a true copy of the above documents(s) in a sealed envelope and placed it for collection in the proper place in our office at Los Angeles, California.

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17

[X] BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address ava.smith@lacity.org to the persons at the email addresses listed in the Service List

18

19

20

[] **BY PERSONAL SERVICE:** I placed a true copy of the above document(s) in a sealed envelope for delivery via messenger by Los Angeles City Attorney's Document Services, 200 No. Main Street, 8th Floor, City Hall East, Los Angeles, CA 90012.

21

[] **BY OVERNIGHT DELIVERY**: I served the documents by placing them in an envelope or package addressed to the persons listed above and providing them to UPS Courier for delivery.

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

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Dated: April 28, 2020 /s/ Ava Smith

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