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21 Attorneys for Plaintiffs

22 **UNITED STATES DISTRICT COURT**

23 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

24 ADAM BRANDY, et al.,
25
26 Plaintiffs,

27 vs.

28 ALEX VILLANUEVA, in his official
capacity as Sheriff of Los Angeles
County, California, and in his capacity as

Case No. 2:20-cv-02874

**DECLARATION OF ALAN
GOTTLIEB IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR TEMPORARY
RESTRAINING ORDER AND
ISSUANCE OF PRELIMINARY
INJUNCTION**

1 the Director of Emergency Operations, et
2 al.,

3 Defendants.
4

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6 **DECLARATION OF ALAN GOTTLIEB**

7 I, Alan Gottlieb, declare as follows:

- 8 1. I am the Executive Vice President of the Second Amendment Foundation,
9 Inc. (“SAF”).
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- 11 2. SAF is a non-profit corporation organized under the laws of the State of
12 Washington with its principal place of business in Bellevue, Washington.
13 The purposes of SAF include promoting the exercise of the right to keep and
14 bear arms and legal action focusing on the constitutional right to privately
15 own and possess firearms. SAF also promotes research and education on the
16 consequences of abridging the right to keep and bear arms and on the
17 historical grounding and importance of the right to keep and bear arms as
18 one of the core civil rights of United States citizens. SAF has over 650,000
19 members and supporters nationwide, including in California.
20
- 21 3. As detailed in the Plaintiffs’ First Amended Complaint, Plaintiffs, Plaintiffs’
22 members and customers, and other similarly situated individuals would
23 exercise the fundamental human right to acquire, keep, bear, and practice
24 proficiency training and shooting with arms – including firearms, ammunition,
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magazines, and appurtenances – for lawful purposes including self-defense, and would do so, but for fear of liability and prosecution under Defendants’ laws, orders, policies, practices, customs, and enforcement actions.

4. SAF has and continues to expend and divert resources, and has been and continues to be adversely and directly harmed, because of Defendants’ laws, policies, orders, practices, customs, and enforcement actions.

5. Accordingly, and for reasons set for in Plaintiffs’ application, I respectfully ask this Court to: (A) Declare that the operation of firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges are “essential” so that firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges may continue to operate; (B) Grant Plaintiffs’ application and issue a temporary restraining order and a preliminary injunction enjoining State and Local Defendants from enforcing their Orders and enforcement policies, practices, and customs that individually and/or collectively violate the Second, Fifth, and Fourteenth Amendments, to restore the status quo ante and so that firearm and ammunition product manufacturers, retailers, importers, distributors, and shooting ranges may continue to operate; and, (C) Grant all other and further relief, including injunctive relief, against Defendants as necessary to effectuate the Court’s judgment, or as the Court otherwise deems just and equitable.

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

Executed on March 30, 2020.


Alan Gottlieb