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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 JONAH  
MARTINEZ 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

5  
6 **DECLARATION OF JONAH MARTINEZ**

7 I, Jonah Martinez, declare as follows:

- 8 1. I am an adult resident of the County of Los Angeles, California, and am a  
9 named plaintiff in the above matter. I have personal knowledge of the facts  
10 stated herein, and if called as a witness, I could competently testify to these  
11 facts.  
12  
13 2. This declaration is executed in support of Plaintiffs' Application for  
14 Temporary Restraining Order and Issuance of Preliminary Injunction.  
15  
16 3. I am not prohibited from possessing firearms or ammunition under federal and  
17 state law.  
18  
19 4. In light of the developing situation involving the spread of COVID-19, and  
20 the release of inmates, I am concerned about my ability to protect myself and  
21 my family. As such, I desire to obtain ammunition for self-defense and other  
22 purposes.  
23  
24 5. Firearm and ammunition product manufacturers, retailers, importers,  
25 distributors, and shooting ranges are "Essential Businesses" to me and my  
26 family.  
27  
28

- 1 6. I possess a firearms safety certificate (“FSC”) as required by the State of  
2 California in order to purchase or acquire a firearm.
- 3 7. Unlike individuals in other states, I cannot lawfully purchase ammunition  
4 online and have it shipped directly to my home.
- 5 8. In order for me to comply with California law, I can only acquire and take  
6 possession of firearms and ammunition in a face to face transaction at a  
7 licensed firearm and ammunition vendor. Defendants’ Orders and actions  
8 have resulted in firearm and ammunition stores being closed in Los Angeles  
9 County.  
10  
11  
12
- 13 9. I want to exercise my right to acquire, keep, bear, and practice proficiency  
14 training and shooting with arms – including firearms, ammunition,  
15 magazines, and appurtenances – for lawful purposes including self-defense,  
16 and would do so, but for the reasonable and imminent fear of arrest and  
17 criminal prosecution under Defendants’ laws, policies, orders, practices,  
18 customs, and enforcement.  
19  
20
- 21 10. Accordingly, and for reasons set for in Plaintiffs’ application, I respectfully  
22 ask this Court to: (A) Declare that the operation of firearm and ammunition  
23 product manufacturers, retailers, importers, distributors, and shooting ranges  
24 are “essential” so that firearm and ammunition product manufacturers,  
25 retailers, importers, distributors, and shooting ranges may continue to operate;  
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(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.

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

Executed on March 30, 2020.

  
Jonah Martinez