

1 Ronda Baldwin-Kennedy, Esq. (SB #302813)  
2 Jerome A. Clay, Esq. (SB #327175)  
3 **LAW OFFICE OF RONDA BALDWIN-KENNEDY**  
4 5627 Kanan Rd. #614  
5 Agoura Hills, CA 91301  
6 Phone: (951) 268-8977  
7 Fax: (702) 974-0147  
8 Email: ronda@lorbk.com

9 Raymond M. DiGuiseppe (SB #228457)  
10 **The DiGuiseppe Law Firm, P.C.**  
11 4320 Southport-Supply Road, Suite 300  
12 Southport, North Carolina 28461  
13 Phone: 910-713-8804  
14 Fax: 910-672-7705  
15 Email: law.rmd@gmail.com

16 Attorneys for Plaintiffs

17 **UNITED STATES DISTRICT COURT**  
18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19 DONALD MCDUGALL, an  
20 individual; JULIANA GARCIA, an  
21 individual; SECOND AMENDMENT  
22 FOUNDATION; CALIFORNIA GUN  
23 RIGHTS FOUNDATION; and  
24 FIREARMS POLICY COALITION,  
25 INC.,

26 Plaintiffs,

27 v.

28 COUNTY OF VENTURA,  
CALIFORNIA; BILL AYUB, in his  
official capacity; WILLIAM T. FOLEY,  
in his official capacity; ROBERT  
LEVIN, in his official capacity; and  
VENTURA COUNTY PUBLIC  
HEALTH CARE AGENCY,

Case No. 2:20-cv-02927

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
PRELIMINARY INJUNCTION;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
THEREOF**

Judge: Hon. Consuelo B. Marshall

Date: Tuesday May 12, 2020

Time: 10:00 a.m.

Courtroom: 8B

Filed concurrently herewith:

(1) Declaration of Donald McDougall

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Defendants.

- (2) Declaration of Juliana Garcia
- (3) Declaration of Alan Gottlieb
- (4) Declaration of Gene Hoffman
- (5) Declaration of Brandon Combs
- (6) Declaration of Ronda Baldwin-Kennedy

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on Tuesday May 12, 2020, at 10:00 a.m., or as soon thereafter as counsel may be heard,<sup>1</sup> before the Honorable Consuelo B. Marshall, in Courtroom 8B of the United States District Court for the Central District of California, located at First Street Courthouse, 350 W. First Street, Los Angeles, California 90012, Plaintiffs Donald McDougall, Juliana Garcia, Second Amendment Foundation, California Gun Rights Foundation, and Firearms Policy Coalition, Inc. (collectively, “Plaintiffs”) will hereby and do move for a Preliminary Injunction enjoining Defendants County of Ventura, California, Bill Ayub, William T. Foley, Robert Levin, and the Ventura County Public Health Agency (collectively, “Defendants”) from enforcing county or state stay-at-home or other emergency orders against the Plaintiffs and others similarly situated so as

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<sup>1</sup> Plaintiffs request, pursuant to L.R. 6-1 (stating the Court may order a shorter time), that this Court act on this motion on an expedited basis as Plaintiffs’ fundamental, constitutionally guaranteed right to keep and bear arms has been and continues to be impermissibly infringed as a result of Defendants’ Orders and actions.

1 to prevent them from engaging in the otherwise lawful acquisition of firearms,  
2 firearms accessories, and or ammunition.

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4 This Motion is pursuant to Rule 65 of the Federal Rules of Civil Procedure  
5 and Local Rule 65-1, on the grounds that immediate and irreparable injury will  
6 result to Plaintiffs unless the activities described above are enjoined pending trial  
7 of this action.

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9 The Motion is based on this Notice and Motion, attached Memorandum of  
10 Points and Authorities, the Declarations of Donald McDougall, Juliana Garcia,  
11 Alan Gottlieb, Gene Hoffman, and Brandon Combs, including exhibits,  
12 concurrently filed, the pleadings and papers on file in this action, and such other  
13 evidence and argument as may be permitted at the hearing.  
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17 Dated: April 14, 2020

LAW OFFICE OF RONDA BALDWIN-KENNEDY

18 /s/ Ronda Baldwin-Kennedy

19 Ronda Baldwin-Kennedy

20 /s/ Raymond DiGuiseppe

21 Raymond DiGuiseppe

22 Attorneys for Plaintiffs  
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