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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 NATIONAL RIFLE ASSOCIATION OF
15 AMERICA; JOHN DOE,

16 Plaintiffs,

17 vs.

18 CITY OF LOS ANGELES; ERIC
19 GARCETTI, in his official capacity as
20 Mayor of City of Los Angeles; HOLLY
21 L. WOLCOTT, in her official capacity as
22 City Clerk of City of Los Angeles; and
23 DOES 1-10,

24 Defendants.

Case No.: 2:19-cv-03212 SVW (GJSx)

**DECLARATION OF LAURA
PALMERIN IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES**

Hearing Date: June 15, 2020
Hearing Time: 1:30 p.m.
Judge: Stephen V. Wilson
Courtroom: 10A

DECLARATION OF LAURA PALMERIN

I, Laura Palmerin, declare as follows:

1. I am a Paralegal at the law firm Michel & Associates, P.C. (“MAPC”), attorneys of record for Plaintiffs in this action. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto.

2. I graduated from California State University of San Marcos in 2012, with a Bachelor’s degree in psychology. In 2014, I obtained my paralegal certification from University of San Diego.

3. I have worked at MAPC, full time as a paralegal from September 2016 to the present.

4. Plaintiffs’ billing records, attached to the Declaration of Haydee Villegas filed simultaneously herewith, include true and accurate copies of my billing records for which fee recovery is sought in this matter. *See* Ex. A (attached to the Declaration of Haydee Villegas filed simultaneously herewith). The records include detailed descriptions of the work I performed on this matter and the time spent on each task between October 2018 and February 2020, as well as work I performed on this fee motion through April 30, 2020. *Id.*

5. In the regular course and scope of my daily business activities, I prepared the descriptions contained in each billing record that shows my name as the “Timekeeper,” and I did so at or near the time of the occurrence of the work that I performed on this matter.

6. The descriptions contained within my billing records are a fair and accurate description of the work I performed on this matter and time spent on each task. In my professional judgment, the amount of time indicated for each task described in my billing records is a reasonable amount of time for me to have spent on the type of work described therein.

7. I spent approximately **3.0** hours engaged in case management work. That

1 time breaks down as follows: (1) about 0.8 hours devoted to litigation team
2 communications, including meetings, emails, and telephone conferences; (2) 1.7
3 hours were spent legal research or document review regarding procedural matters;
4 and (3) 0.5 hours involved filing-related activities. Exs. A, C (attached to the
5 Declaration of Anna M. Barvir filed simultaneously herewith).

6 8. I spent approximately **2.4** hours during the complaint phase of litigation.
7 That time breaks down as follows: This time breaks down as follows: (1) about 1.2
8 hours were spent on creating, drafting, and revising the complaint; and (2) about 1.0
9 hour was devoted to conducting internet research to find and pull articles and other
10 documents relevant to Plaintiffs' claims, profiling the documents in the firm's
11 electronic filing system to be used as evidence, and distributing the documents to
12 appropriate litigation team members. The remainder of my complaint-related time
13 (0.2) was spent exchanging inter-office emails and briefly reviewing the filed
14 complaint. Exs. A, C.

15 9. I spent approximately **17.5** hours during the motions phase of litigation.
16 That time breaks down as follows: (1) about 8.2 hours were spent drafting, reviewing,
17 and revising templates and rough drafts of motion-related documents including
18 notices, memorandums of points and authorities, declarations, and stipulations; (2)
19 about 4.6 hours were devoted to various filing-related activities, including compiling
20 and preparing exhibits and preparing mandatory chambers copies; (3) about 0.9 hour
21 was spent engaged in communications with litigation team, including emails,
22 meetings, and telephone conferences; (4) about 0.4 hour was spent drafting
23 correspondence to the court clerk; (5) about 0.8 hour was spent reviewing,
24 comparing, and analyzing the City's motion to dismiss and opposition to preliminary
25 injunction; and (6) 2.6 hours was spent assisting counsel prepare for hearing. Exs. A,
26 C.

27 10. I spent approximately **4.7** hours during the discovery phase of litigation.
28 That time breaks down as follows: (1) about 2.5 hours were spent on activities related

1 to propounding requests for public records under California’s Public Records Act
2 (PRARs) and compiling, reviewing, and distributing responses to those requests; (2)
3 about 0.3 hours were spent engaged in communications with the litigation team,
4 including emails and meetings; and (3) about 1.9 hours were spent drafting specific
5 discovery requests. Exs. A, C.

6 11. I spent approximately **1.6** hours during the settlement phase of litigation,
7 including time spent reviewing and revising the parties’ joint stipulation and related
8 documents, emailing members of the litigation team and the court clerk, and
9 preparing the mandatory chambers copies of the parties’ joint stipulation and related
10 documents. Exs. A, C.

11 12. I spent approximately **0.5** hours during the pre-trial and trial preparation
12 phase of litigation. All of this time was devoted to revising the exhibit list. Exs. A, C.

13 13. I spent approximately **1.8** hours during the fee motion phase, including
14 time spent drafting, reviewing and revising the moving papers and supporting
15 documents, communicating with the attorneys preparing the motion, and preparing
16 and finalizing the motion for filing. Exs. A, C.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed within the United States on April 30, 2020.



Laura Palmerin
Declarant

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *National Rifle Association, et al., v. City of Los Angeles, et al.*
Case No.: 2:19-cv-03212 SVW (GJSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF LAURA PALMERIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Benjamin F. Chapman
Los Angeles City Attorney
200 N. Main St., Suite 675
Los Angeles, CA 90012
benjamin.chapman@lacity.org
Attorneys for Defendants

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

Executed April 30, 2020.

s/ Laura Palmerin

Laura Palmerin