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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 TIFFANY D.
CHEVRONT 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

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DECLARATION OF TIFFANY D. CHEUVRONT

I, Tiffany D. Chevront, declare as follows:

1. I am an attorney licensed to practice law in the state of California and before the United States District Court for the Central District of California. I am an Associate Attorney 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.

Plaintiffs’ Counsel’s Background and Experience

2. I graduated from Trinity Law School in 2017 where I was an active member of the institution’s law review and moot court team.

3. I have been admitted to practice law before the courts of California since November 2017. I am also currently licensed to practice before the United States District Courts for the Central Division and the Southern Division.

4. I began my full-time legal career in December 2017 as an associate attorney at MAPC. I have served in that capacity continuously since that time.

5. My practice for the last three years has focused primarily on civil litigation and legislative matters involving local, state, and federal firearms laws. I also am corporate counsel for the California Rifle & Pistol Association, Incorporated, for which my primary practice concerns corporate compliance and nonprofit law.

6. I regularly appear at local city and county legislative meetings and special events where I speak and inform the public and governing bodies of the legal ramifications and effects of proposed firearm-related legislation and government actions as they relate to constitutional law and civil rights.

7. During this matter, I was categorized by Michel & Associates, P.C., as “Associate 2.” *See* Ex. B (attached to declaration of Anna M. Barvir filed simultaneously herewith). My \$325 hourly rate is well within the hourly rates

1 charged by highly specialized firms for attorneys of similar skill, experience, and
2 expertise in Southern California.

3 **Authentication of Billing**

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

11 9. In the regular course and scope of my daily business activities, I
12 prepared the descriptions in each billing record that shows my name as the
13 "Timekeeper," and I did so at or near the time of the occurrence of the work that I
14 performed on this matter.

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

20 **Role in the Litigation**

21 11. I spent approximately **5.4** hours engaged in case management work.
22 That time breaks down as follows: (1) about 3.0 hours engaged in meetings, emails,
23 and telephone conferences with members of the litigation team assigned to this case;
24 and (2) about 2.4 hours conducting legal research on case-related issues. Exs. A, C
25 (attached to the Declaration of Anna M. Barvir filed simultaneously herewith).

26 12. I spent approximately about **63.4** hours during the complaint phase.
27 This time breaks down as follows: (1) about 6.3 hours were spent in meetings,
28 generally with the litigation team to discuss strategies for opposing the ordinance

1 and, later, building a case and preparing the complaint; (2) about 0.8 hour was spent
2 engaged in activities related to various requests for case-relevant public records my
3 office propounded pursuant to California's Public Record Act (PRARs); (3) about
4 5.4 hours were devoted to telephone conferences with the litigation team and the
5 clients; (4) about 23.8 hours were spent preparing the first draft of the complaint; (5)
6 about 14.0 hours were spent researching various legal and factual issues necessary to
7 drafting Plaintiffs' opposition and pre-litigation demand letters to the City and the
8 complaint; (6) about 4.7 hours were spent drafting and exchanging emails with the
9 litigation team and the clients; and (7) about 0.8 hour was spent drafting
10 correspondence to clients. About 6.0 hours were spent drafting letters to the Los
11 Angeles City council opposing the challenged ordinance before it took effect and
12 demanding repeal of the ordinance before suing. The remainder of my time was
13 spent finalizing the complaint and assisting with its filing. Exs. A, C.

14 13. I spent approximately about **82.4** hours during the motions phase. This
15 time breaks down as follows: (1) about 44.5 hours were devoted to drafting,
16 reviewing, and revising filings; (2) about 24.9 hours were spent conducting legal
17 research and analysis of issues arising necessary to preparing Plaintiffs' moving and
18 opposition papers; (3) about 4.1 hours were spent communicating with the litigation
19 team, through meetings, telephone conferences, and emails, to discuss the status of,
20 strategies for, assignments related to, and other aspects of motions practice; and (4)
21 about 8.1 hours were spent preparing for and attending the hearing on Plaintiffs'
22 motion for preliminary injunction and the City's motion to dismiss. The remainder of
23 my time (less than an hour) was spent analyzing the City's moving papers to assist
24 me and Mr. Brady prepare Plaintiffs' opposition. Exs. A, C.

25 14. I spent approximately **1.4** hours during the discovery phase of litigation.
26 All of this time was devoted to reviewing relevant Public Records Act materials or in
27 meetings with law clerks regarding tasks related to them. Exs. A, C.

28 15. I spent approximately **0.2** hours during the settlement phase of

1 litigation, handling a discrete issue with approval of the settlement. Exs. A, C.

2 16. I spent approximately **5.7** hours during the pre-trial and trial
3 preparation phase of litigation. The entirety of this time was related to compiling
4 exhibits and preparing a first draft of Plaintiffs' Exhibit List. Exs. A, C.

5 17. I spent approximately **.20** hours during the fee motion phase of
6 litigation. The entirety of that time was spent reviewing, revising, and approving my
7 declaration in support of Plaintiffs' fee motion. Exs. A, C.

8
9 I declare under penalty of perjury under the laws of the United States that the
10 foregoing is true and correct. Executed within the United States on April 30, 2020.

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Tiffany D. Chevront
14 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 TIFFANY D. CHEUVRONT 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