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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)

**PLAINTIFFS’ NOTICE OF  
MOTION AND MOTION FOR  
ATTORNEYS’ FEES AWARD  
PURSUANT TO 42 U.S.C. § 1988**

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

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 15, 2020 at 1:30 p.m. in Courtroom  
3 10A of the above-captioned court, located at 350 West First Street, Los Angeles,  
4 California 90012, Plaintiffs National Rifle Association and John Doe (“Plaintiffs”),  
5 through their counsel of record, will and hereby do move for an award of reasonable  
6 attorneys’ fees under 42 U.S.C. § 1988.

7 Plaintiffs make this motion because Plaintiffs prevailed on their section 42  
8 U.S.C. § 1983 challenge to Defendant’s ordinance requiring all current and  
9 prospective city contractors to disclose any “sponsorship of” or “contract with” with  
10 Plaintiff NRA, and they are thus entitled to a reasonable fee award. Plaintiffs’ counsel  
11 provides with this motion extensive evidence of the number of hours reasonably spent  
12 to bring this case to its successful conclusion, as well as evidence and case citation of  
13 the reasonable hourly rates of Los Angeles area attorneys.

14 This motion is based upon this notice of motion and motion, as well as the  
15 memorandum of points and authorities, the request for judicial notice, the  
16 declarations of Anna M. Barvir, Sean A. Brady, Tiffany D. Chevront, Joshua R.  
17 Dale, Alexander A. Frank, C. D. Michel, Konstadinos T. Moros, Laura Palmerin, and  
18 Haydee Villegas, and all exhibits filed simultaneously herewith. This motion is also  
19 based on all other matters of which the Court may take notice, the oral argument of  
20 counsel, pleadings already on file with the Court, and all other evidence that may be  
21 presented at the hearing on this matter

22 This motion is made following the conference of counsel pursuant to L.R. 7-3  
23 which took place on April 23, 2020.

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25 Dated: April 30, 2020

**MICHEL & ASSOCIATES, P.C.**

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s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Plaintiffs

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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:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES AWARD PURSUANT TO 42 U.S.C. § 1988**

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](mailto: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