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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)

**SUPPLEMENTAL  
DECLARATION OF SEAN A.  
BRADY 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

**SUPPLEMENTAL DECLARATION OF SEAN A. BRADY**

I, Sean A. Brady, 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 attorney and Partner 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. The Partner at MAPC primarily responsible for this matter, Anna M. Barvir, had to fly to the east coast due to a death in her family in mid-June 2019, shortly before the deadline for Plaintiffs to file their opposition to the City’s motion to dismiss.

3. I instructed our mutual paralegal and assistant, Ms. Laura Palmerin, to email opposing counsel, Mr. Benjamin Chapman, to request his stipulation to continuing the imminent hearing and reply deadlines on parties’ motions and to explain that it is due to a death in Ms. Barvir’s family.

4. Mr. Chapman responded that he could move it to July 22, but that was the only available date. He further represented that because “we already had 3 weeks for the Opposition and it is due Monday, I do not see a reason to change that date. I’m sure you are done with that opposition anyway. By changing the hearing date, we are only changing the reply due date, which will give Anna an extra 2 weeks. Does that work?”

5. I responded to Mr. Chapman that his proposal does not fully accommodate Ms. Barvir because of the considerable disruption to her ability to focus on the necessary motion practice. I informed Mr. Chapman that Plaintiffs would be moving ex parte for relief and requested him to state whether the City would oppose.

6. Mr. Chapman responded that he did not construe Ms. Palmerin’s original

1 email to him as I had intended it to be read, and specifically asked how much time my  
2 office would need to file its opposition to the City's motion to dismiss. I responded  
3 with specific suggestions and another request to clarify the City's stance on Plaintiffs'  
4 imminent ex parte application. To which Mr. Chapman responded that he would  
5 stipulate and does not oppose Plaintiffs' ex parte.

6 7. I responded that we would normally opt to approach the Court with a  
7 stipulation, however, I learned that such relief requires five days-notice which was  
8 impracticable given the impending deadline, hence necessitating an immediate ex  
9 parte application.

10 8. Plaintiffs filed their ex parte application shortly thereafter and the Court  
11 granted the requested relief.

12  
13 I declare under penalty of perjury under the laws of the United States that the  
14 foregoing is true and correct. Executed within the United States on June 1, 2020.

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Sean A. Brady  
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:

**SUPPLEMENTAL DECLARATION OF SEAN A. BRADY 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  
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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 June 1, 2020.

*s/ Laura Palmerin*  
\_\_\_\_\_  
Laura Palmerin