

**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
on 1/12/2021 9:21 AM
Reviewed By: A. Rodriguez
Case #19CV346360
Envelope: 5621425**

C. D. Michel – SBN 144258
Anna M. Barvir – SBN 268728
Tiffany D. Cheuvront – SBN 317144
MICHEL & ASSOCIATES, P.C.
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Attorneys for Plaintiffs/Petitioners
G. Mitchell Kirk and California Rifle
& Pistol Association, Incorporated

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

DOWNTOWN COURTHOUSE

G. MITCHELL KIRK; and CALIFORNIA
RIFLE & PISTOL ASSOCIATION,
INCORPORATED,

Plaintiffs and Petitioners,

vs.

CITY OF MORGAN HILL; MORGAN HILL
CHIEF OF POLICE DAVID SWING, in his
official capacity; MORGAN HILL CITY
CLERK IRMA TORREZ, in her official
capacity; and DOES 1-10,

Defendants and Respondents.

Case No: 19CV346360

[Assigned to the Honorable Peter H. Kirwan;
Department 19]

**DECLARATION OF ANNA M. BARVIR RE:
NOTICE APPEAL**

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1. I am an attorney licensed to practice before all courts in the state of California. The law firm where I am employed, Michel and Associates, P.C., is council of record for Plaintiffs G. Mitchell Kirk and California Rifle & Pistol Association, Incorporated, in the above-entitled matter. I make this declaration in support of Plaintiffs' Notice of Appeal. I have personal knowledge of the facts set forth herein and if called as a witness, I could and would competently testify hereto.

3. On August 25, 2020, after appropriately serving Plaintiffs with a draft for review, Defendants the City of Morgan Hill, Morgan Hill Chief of Police David Swing, and Morgan Hill City Clerk Irma Torrez filed a Proposed Judgment. (See Proposed Judgment attached hereto as **Exhibit A.**)

5. On October 26, 2020, a Court Clerk replied to Ms. Palmerin's email, explaining that Defendants' Proposed Judgment was missing a signature line for the judge to sign and that they would inform the City. (Exhibit B.)

7. At that point, I was unsure whether the Court had, in fact, informed counsel for Defendants of the defective proposed judgment. I thus directed Ms. Palmerin to send an email to

1 Mr. James Allison, attorney of record for the Defendants, informing him of the missing signature
2 line and requesting that Defendants file another proposed judgment for the court's consideration
3 and signature. (Exhibit B.)

4 8. The City filed a revised Proposed Judgment on November 24, 2020. (See revised
5 Proposed Judgment filed on Nov. 24, 2020, attached hereto as **Exhibit C.**)

6 9. On December 29, 2020, having still received nothing indicating that the court had
7 adopted Defendants' Proposed Judgment or otherwise entered judgment in this matter, I directed
8 Ms. Palmerin to once again send an email to the Civil Department Court Clerk requesting an
9 update on the status on the revised Proposed Judgment. (Exhibit B.) We still have not received a
10 response.

11 10. Out of an abundance of caution and to prevent missing any deadline for the filing of
12 an appeal that might have been triggered even though the court has not yet entered a final
13 judgment in this matter, we are now filing a Notice of Appeal.

14
15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on January 11, 2021, at Stanton, California.

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19 Anna M. Barvir
20 Declarant
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EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 203714 NAME: Anthony P. Schoenberg FIRM NAME: Farella Braun + Martel, LLP STREET ADDRESS: 235 Montgomery Street, 17 th Floor CITY: San Francisco STATE: CA ZIP CODE: 94104 TELEPHONE NO.: 415-954-4400 FAX NO.: 415-954-4480 E-MAIL ADDRESS: tschoenberg@fbm.com CITY OF MORGAN HILL, MORGAN HILL CHIEF OF POLICE ATTORNEY FOR (name): DAVID SWING, MORGAN HILL CITY CLERK IRMA TORREZ		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 161 N. First Street MAILING ADDRESS: CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME:		
PLAINTIFF/PETITIONER: G. MITCHELL KIRK; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED CITY OF MORGAN HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; DEFENDANT/RESPONDENT: MORGAN HILL CITY CLERK IRMA TORREZ OTHER:		CASE NUMBER: 19CV346360 JUDICIAL OFFICER:
PROPOSED ORDER (COVER SHEET)		DEPT:

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

- Name of the party submitting the proposed order:
CITY OF MORGAN HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN HILL CITY CLERK IRMA TORREZ
- Title of the proposed order:
[Proposed] Judgment
- The proceeding to which the proposed order relates is:
Motion for Summary Judgment
 - Description of proceeding: Summary Judgment Hearing
 - Date and time: July 30, 2020, 9:00 a.m.
 - Place: Department 6, Santa Clara Superior Court
- The proposed order was served on the other parties in the case.
Yes

Anthony P. Schoenberg

(TYPE OR PRINT NAME)

►  (SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME: Kirk v. City of Morgan Hill	CASE NUMBER: 19CV346360
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**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):
235 Montgomery Street, 17th Floor, San Francisco, CA 94104

b. My electronic service address is (*specify*):
pwoodfin@fbm.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
C.D. Michel, Esq.
Anna M. Barvir, Esq.
Tiffany D. Cheuvront, Esq.
MICHEL & ASSOCIATES, P.C.
180 Est Ocean Blvd., Suite 200
Long Beach, CA 90802
Tel: (562) 216-4444
Fax: (562) 216-4445

b. To (*electronic service address of person served*):
cmichel@michellawyers.com
tcheuvront@michellawyers.com
abarvir@michellawyers.com

c. On (*date*):
August 25, 2020

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

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

Date:
August 25, 2020

Pam Woodfin

(TYPE OR PRINT NAME OF DECLARANT)

▶ Pam Woodfin

(SIGNATURE OF DECLARANT)



1 Anthony P. Schoenberg (State Bar No. 203714)
tschoenberg@fbm.com

2 James Allison (State Bar No. 319204)
jallison@fbm.com

3 Farella Braun + Martel LLP
235 Montgomery Street, 17th Floor
4 San Francisco, California 94104
Telephone: (415) 954-4400
5 Facsimile: (415) 954-4480

6 Hannah Shearer (State Bar No. 292710)
hshearer@giffords.org
7 Giffords Law Center to Prevent Gun Violence
268 Bush Street #555
8 San Francisco, CA 94104
Telephone: (415) 433-2062
9 Facsimile: (415) 433-3357

10 Attorneys for CITY OF MORGAN HILL,
MORGAN HILL CHIEF OF POLICE DAVID
11 SWING, MORGAN HILL CITY CLERK IRMA
TORREZ

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SANTA CLARA, DOWNTOWN COURTHOUSE

15 G. MITCHELL KIRK; and CALIFORNIA
16 RIFLE & PISTOL ASSOCIATION,
INCORPORATED,

17 Plaintiffs and Petitioners,

18 vs.

19 CITY OF MORGAN HILL; MORGAN HILL
20 CHIEF OF POLICE DAVID SWING, in his
official capacity; MORGAN HILL CITY
21 CLERK IRMA TORREZ, in her official
capacity; and DOES 1-10,,
22

23 Defendants and Respondents.

Case No. 19CV346360

PROPOSED JUDGMENT

Action Filed: April 15, 2019

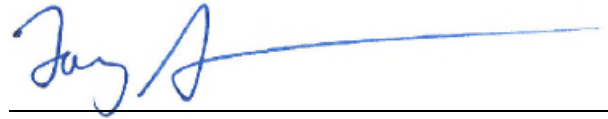
24 The Court hereby enters judgment in favor of Defendants, CITY OF MORGAN HILL;
25 MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN HILL
26 CITY CLERK IRMA TORREZ, in her official capacity sued herein as CITY OF MORGAN
27 HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN
28 HILL CITY CLERK IRMA TORREZ, in her official capacity, and against Plaintiff G.

1 MITCHELL KIRK; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED,
2 pursuant to the attached Order granting Defendants' Motion for Summary Judgment, signed by the
3 Court on July 30, 2020.

4 Dated: August 24, 2020

FARELLA BRAUN + MARTEL LLP

5
6 By:



Anthony Schoenberg

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8 Attorneys for CITY OF MORGAN HILL, MORGAN
9 HILL CHIEF OF POLICE DAVID SWING, MORGAN
10 HILL CITY CLERK IRMA TORREZ
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1 Roderick M. Thompson (State Bar No. 96192)
2 rthompson@fbm.com
3 Anthony P. Schoenberg (State Bar No. 203714)
4 tschoenberg@fbm.com
5 James Allison (State Bar No. 319204)
6 jallison@fbm.com
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10 Telephone: (415) 954-4400
11 Facsimile: (415) 954-4480
12
13 Hannah Shearer (State Bar No. 292710)
14 hshearer@giffords.org
15 Giffords Law Center to Prevent Gun Violence
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17 San Francisco, CA 94104
18 Telephone: (415) 433-2062
19 Facsimile: (415) 433-3357

20 Attorneys for CITY OF MORGAN HILL,
21 MORGAN HILL CHIEF OF POLICE DAVID
22 SWING, MORGAN HILL CITY CLERK IRMA
23 TORREZ

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G. MITCHELL KIRK; and CALIFORNIA
RIFLE & PISTOL ASSOCIATION,
INCORPORATED,

Plaintiffs and Petitioners,

vs.

CITY OF MORGAN HILL; MORGAN HILL
CHIEF OF POLICE DAVID SWING, in his
official capacity; MORGAN HILL CITY
CLERK IRMA TORREZ, in her official
capacity; and DOES 1-10,

Defendants and Respondents.

Case No. 19CV346360

PROOF OF SERVICE

Action Filed: April 15, 2019

1 **PROOF OF SERVICE**

2 **Kirk v. City of Morgan Hill**
3 **Case No. 19CV346360**

4 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of San Francisco, State of California. My business address is 235
7 Montgomery Street, 17th Floor, San Francisco, CA 94104.

8 On August 25, 2020, I served true copies of the following document(s) described as

9 **NOTICE OF WITHDRAWAL AS COUNSEL;**

10 **NOTICE OF APPEARANCE;**

11 **PROPOSED ORDER (COVER SHEET) and PROPOSED JUDGMENT**

12 on the interested parties in this action as follows:

13 C.D. Michel, Esq.
14 Anna M. Barvir, Esq.
15 Tiffany D. Cheuvront, Esq.
16 MICHEL & ASSOCIATES, P.C.
17 180 Est Ocean Blvd., Suite 200
18 Long Beach, CA 90802
19 Tel: (562) 216-4444
20 Fax: (562) 216-4445
21 cmichel@michellawyers.com
22 tcheuvront@michellawyers.com
23 abarvir@michellawyers.com

24 **BY ELECTRONIC SERVICE:** I served the document(s) on the person listed in the
25 Service List by submitting an electronic version of the document(s) to One Legal, LLC, through
26 the user interface at www.onelegal.com.

27 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
28 document(s) to be sent from e-mail address pwoodfin@fbm.com to the persons at the e-mail
addresses listed in the Service List. I did not receive, within a reasonable time after the
transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on August 25, 2020, at San Francisco, California.


25 
26 _____
27 Pamela Woodfin
28

EXHIBIT B

Laura Palmerin

From: Laura Palmerin
Sent: Wednesday, October 14, 2020 10:36 AM
To: ssweb@scscourt.org
Subject: Kirk v. City of Morgan Hill, Case No. 19CV346360 [MA-Interwoven.FID78693]
Attachments: 2132695_2020-08-25 Proposed Judgment.PDF


Follow Up Flag: Follow up
Flag Status: Completed

Hello,

Attorneys for Plaintiffs in the above-referenced matter would like to follow up on the attached Proposed Judgment filed on August 25, 2020 by Defendants. Please let us know if a Judgment will be issued by the Court or if anything else is required from us to get the Judgment issued.

Please feel free to contact me if you have any questions or concerns.

Best regards,

<p>Laura Palmerin Legal Secretary/Paralegal</p>  <p>MICHEL & ASSOCIATES, P.C. Attorneys at Law Environmental - Land Use - Firearms - Employment Law Civil Litigation - Criminal Defense</p>	<p>Direct: (562) 216-4473 Main: (562) 216-4444 Fax: (562) 216-4445 Email: lpalmerin@michellawyers.com Web: www.michellawyers.com</p> <p>180 E. Ocean Blvd. Suite 200 Long Beach, CA 90802</p>
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This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Michel & Associates, PC at (562) 216-4444 if you need assistance.

Laura Palmerin

From: SSCivil Info <sscivilinfo@scscourt.org>
Sent: Monday, October 26, 2020 12:57 PM
To: Laura Palmerin
Subject: Re: Kirk v. City of Morgan Hill, Case No. 19CV346360 [MA-Interwoven.FID78693]

Good Afternoon,

The Proposed Judgment does not have a signature line for the Judge. We will be notifying the submitting party to resubmit their order.

clerk

Laura Palmerin

From: SSWeb <ssweb@scscourt.org>
Sent: Friday, November 20, 2020 11:58 AM
To: Laura Palmerin
Subject: FW: Kirk v. City of Morgan Hill, Case No. 19CV346360 [MA-Interwoven.FID78693]

We apologize for the delay in response to your email due to shortage of staffing.

It appears there is no signature line on the proposed judgment for the judge to sign.

Civil Clerk - ar

Laura Palmerin

From: Laura Palmerin
Sent: Friday, November 20, 2020 5:31 PM
To: tschoenberg@fbm.com; James Allison
Cc: Anna M. Barvir
Subject: Kirk v. City of Morgan Hill, Case No. 19CV346360 [MA-Interwoven.FID78693]
Attachments: 2132695_2020-08-25 Proposed Judgment.PDF; Court's 10-26-20 Email Response.pdf; Court's 11-20-20 Email Response.pdf


Hello Counsel,

Since we had not heard back from the Court regarding your filed Proposed Judgment (attached here) we reached out to the Clerk on October 14, 2020. The Clerk replied to our email on October 26, 2020 stating that the Proposed Judgment did not have a signature line for the Judge to sign off and that they would be informing the filing party of this, their email response attached here. Today we got another response from the Court stating the same (but did not say they would let the filing party know), email attached here.

So we just wanted to let you know to see if you could please file a revised Proposed Judgment with a signature line for the Judge to sign.

Please feel free to contact our office if you have any questions or concerns.

Best regards,

<p>Laura Palmerin Legal Secretary/Paralegal</p> 	<p>Direct: (562) 216-4473 Main: (562) 216-4444 Fax: (562) 216-4445 Email: lpalmerin@michellawyers.com Web: www.michellawyers.com</p> <p>180 E. Ocean Blvd. Suite 200 Long Beach, CA 90802</p>
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and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Michel & Associates, PC at (562) 216-4444 if you need assistance.

ease notify us immediately by reply e-mail

Laura Palmerin


From: Laura Palmerin
Sent: Tuesday, December 29, 2020 12:18 PM
To: sscivilinfo@scscourt.org
Subject: Kirk v. City of Morgan Hill, Case No.: 19CV346360 [MA-Interwoven.FID78693]
Attachments: 2142083_2020-11-24 Revised Proposed Judgment.PDF

Hello,

We would like to follow up regarding a Proposed Judgment that was filed on November 24, 2020, attached here. Please let us know when we could expect to receive the signed Judgment.

Please feel free to contact us if there are any issues with processing the document.

Best regards,

<p>Laura Palmerin Legal Secretary/Paralegal</p>  <p>MICHEL & ASSOCIATES, P.C. Attorneys at Law Environmental - Land Use - Firearms - Employment Law Civil Litigation - Criminal Defense</p>	<p>Direct: (562) 216-4473 Main: (562) 216-4444 Fax: (562) 216-4445 Email: lpalmerin@michellawyers.com Web: www.michellawyers.com</p> <p>180 E. Ocean Blvd. Suite 200 Long Beach, CA 90802</p>
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EXHIBIT C

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 203714 NAME: Anthony P. Schoenberg FIRM NAME: Farella Braun + Martel, LLP STREET ADDRESS: 235 Montgomery Street, 17 th Floor CITY: San Francisco STATE: CA ZIP CODE: 94104 TELEPHONE NO.: 415-954-4400 FAX NO.: 415-954-4480 E-MAIL ADDRESS: tschoenberg@fbm.com CITY OF MORGAN HILL, MORGAN HILL CHIEF OF POLICE ATTORNEY FOR (name): DAVID SWING, MORGAN HILL CITY CLERK IRMA TORREZ		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 161 N. First Street MAILING ADDRESS: CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME:		
PLAINTIFF/PETITIONER: G. MITCHELL KIRK; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED CITY OF MORGAN HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; DEFENDANT/RESPONDENT: MORGAN HILL CITY CLERK IRMA TORREZ OTHER:		CASE NUMBER: 19CV346360 JUDICIAL OFFICER:
PROPOSED ORDER (COVER SHEET)		DEPT:

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

- Name of the party submitting the proposed order:
CITY OF MORGAN HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN HILL CITY CLERK IRMA TORREZ
- Title of the proposed order:
[Proposed] Judgment
- The proceeding to which the proposed order relates is:
Motion for Summary Judgment
 - Description of proceeding: Summary Judgment Hearing
 - Date and time: July 30, 2020, 9:00 a.m.
 - Place: Department 6, Santa Clara Superior Court
- The proposed order was served on the other parties in the case.
Yes

Anthony P. Schoenberg

(TYPE OR PRINT NAME)

►  (SIGNATURE OF PARTY OR ATTORNEY)

1 Anthony P. Schoenberg (State Bar No. 203714)
tschoenberg@fbm.com

2 James Allison (State Bar No. 319204)
jallison@fbm.com

3 Farella Braun + Martel LLP
235 Montgomery Street, 17th Floor
4 San Francisco, California 94104
Telephone: (415) 954-4400
5 Facsimile: (415) 954-4480

6 Hannah Shearer (State Bar No. 292710)
hshearer@giffords.org
7 Giffords Law Center to Prevent Gun Violence
268 Bush Street #555
8 San Francisco, CA 94104
Telephone: (415) 433-2062
9 Facsimile: (415) 433-3357

10 Attorneys for CITY OF MORGAN HILL,
MORGAN HILL CHIEF OF POLICE DAVID
11 SWING, MORGAN HILL CITY CLERK IRMA
TORREZ

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SANTA CLARA, DOWNTOWN COURTHOUSE

15 G. MITCHELL KIRK; and CALIFORNIA
16 RIFLE & PISTOL ASSOCIATION,
INCORPORATED,

17 Plaintiffs and Petitioners,

18 vs.

19 CITY OF MORGAN HILL; MORGAN HILL
20 CHIEF OF POLICE DAVID SWING, in his
official capacity; MORGAN HILL CITY
21 CLERK IRMA TORREZ, in her official
capacity; and DOES 1-10,

22 Defendants and Respondents.
23

Case No. 19CV346360

PROPOSED JUDGMENT

Action Filed: April 15, 2019

24 The Court hereby enters judgment in favor of Defendants, CITY OF MORGAN HILL;
25 MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN HILL
26 CITY CLERK IRMA TORREZ, in her official capacity sued herein as CITY OF MORGAN
27 HILL; MORGAN HILL CHIEF OF POLICE DAVID SWING, in his official capacity; MORGAN
28 HILL CITY CLERK IRMA TORREZ, in her official capacity, and against Plaintiff G.

1 MITCHELL KIRK; and CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED,
2 pursuant to the Order granting Defendants' Motion for Summary Judgment, signed by the Court
3 on July 30, 2020.

4 Dated:
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7 Peter H. Kirwan
8 Judge of the Superior Court
9 County of Santa Clara
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CASE NAME: Kirk v. City of Morgan Hill	CASE NUMBER: 19CV346360
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**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):
235 Montgomery Street, 17th Floor, San Francisco, CA 94104

b. My electronic service address is (*specify*):
abrown@fbm.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
C.D. Michel, Esq.
Anna M. Barvir, Esq.
Tiffany D. Cheuvront, Esq.
MICHEL & ASSOCIATES, P.C.
180 Est Ocean Blvd., Suite 200
Long Beach, CA 90802
Tel: (562) 216-4444 / Fax: (562) 216-4445

b. To (*electronic service address of person served*):
cmichel@michellawyers.com; tcheuvront@michellawyers.com; abarvir@michellawyers.com

c. On (*date*):
11-24-2020

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

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

Date:
11-24-2020

Alison Brown
(TYPE OR PRINT NAME OF DECLARANT)

► 
(SIGNATURE OF DECLARANT)

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