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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO

DAVID GENTRY, JAMES PARKER,  
MARK MIDLAM, JAMES BASS, and  
CALGUNS SHOOTING SPORTS  
ASSOCIATION,

Plaintiffs and Petitioners,

v.

XAVIER BECERRA, in His Official  
Capacity as Attorney General For the State  
of California; STEPHEN LINDLEY, in  
His Official Capacity as Acting Chief for  
the California Department of Justice,  
BETTY T. YEE, in Her Official Capacity  
as State Controller, and DOES 1 - 10,

Defendants and Respondents.

Case No. 34-2013-80001667

**DECLARATION OF ANNA M. BARVIR IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES**

(Filed concurrently with Notice of Motion &  
Motion, Memorandum of Points & Authorities in  
Support, Request for Judicial Notice, Proposed  
Order, Declaration of Sean A. Brady, Declaration of  
Alexander A. Frank, Declaration of Scott M.  
Franklin, Declaration of C.D. Michel, Declaration  
of Albert E. Peacock, III, and Haydee Villegas,  
Exhibits A-I)

Hearing Date: January 14, 2022

Hearing Time: 10:00 a.m.

Department: 21

Judge: Hon. Shelleyanne W.L. Chang

Trial Date: August 24, 2018

Action Filed: October 16, 2013

FILED  
Superior Court Of California,  
Sacramento  
10/12/2021  
tcrowther  
By \_\_\_\_\_, Deputy  
Case Number:  
34-2013-80001667



1 court, under Cal. Code Civ. Proc., § 1021.5 and 42 U.S.C. § 1988(b), and regularly prepare fee  
2 motions for the attorneys at Michel & Associates, P.C.

3           6.       I also focus much of my practice on appellate matters, having briefed several  
4 appeals before the federal courts of appeals, the California Court of Appeal and California Supreme  
5 Court. I have prepared emergency filings for the California Court of Appeal, the Ninth Circuit, and  
6 the U.S. Supreme Court. I have assisted with the drafting of several petitions for certiorari. I have  
7 also argued before the Ninth and D.C. Circuits, as well as the Washington State Court of Appeals.

8           7.       Recently, I served as lead trial counsel in *Duncan v. Becerra*, S.D. Cal. Case No.  
9 17-cv-01017, a successful Second Amendment and Takings Clause challenge to California’s ban on  
10 ammunition magazines over ten rounds. As lead counsel, I was primarily responsible for all case  
11 management and litigation strategy, I took or defended six expert witness depositions, I handled all  
12 aspects of propounding and responding to written discovery, and I handled plaintiffs’ successful  
13 motions for preliminary injunction and summary judgment. The trial court decision granting  
14 summary judgment in plaintiffs’ favor is considered by some to be among the most influential  
15 Second Amendment decisions since *McDonald v. City of Chicago*, 561 U.S. 742 (2010).

16           8.       I am also lead counsel in *Wright v. Beck*, C.D. Cal. Case No. 15-cv-05805 & 9th  
17 Cir. Case No. 19-55084. That case involves Fourth and Fourteenth Amendment challenges to the  
18 permanent seizure and destruction of about half-a-million dollars’ worth of personal firearm  
19 property and the refusal to return about \$1,000 in cash by the Los Angeles Police Department and  
20 Los Angeles City Attorney’s Office. The trial court initially threw out the case on the City’s motion  
21 to dismiss. But on appeal, which I briefed and argued, a panel of the Ninth Circuit unanimously  
22 reversed the dismissal. On remand, the trial court granted summary judgment in the City’s favor,  
23 and Plaintiff Wright again appealed to the Ninth Circuit. I was again primarily responsible for  
24 litigating the appeal on Mr. Wright’s behalf. In December 2020, a panel of the Ninth Circuit *again*  
25 ruled in Mr. Wright’s favor.

26           9.       As a first- and second-year attorney, I was integral to the success of *Parker v.*  
27 *California*, Fresno Super. Ct. Case No. 10CECG02116, Cal. Ct. App. 5th Dist. Case Nos. F062480  
28 & F062709, & Cal. Sup. Ct. Case No. S215265, a constitutional vagueness challenge to A.B. 962’s





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**PROOF OF SERVICE**

STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Blvd., Suite 200, Long Beach, CA 90802.

On October 12, 2021, the foregoing document described as

**DECLARATION OF ANNA M. BARVIR IN SUPPORT OF PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES**

on the interested parties in this action by placing  
 the original  
 a true and correct copy  
thereof enclosed in sealed envelope(s) addressed as follows:

Ryan A. Hanley  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
[Ryan.Hanley@doj.ca.gov](mailto:Ryan.Hanley@doj.ca.gov)

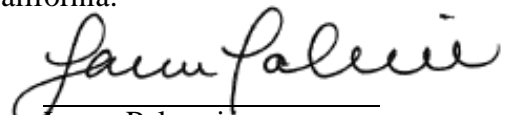
*Attorney for Defendants*

(**BY OVERNIGHT MAIL**) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for overnight delivery by UPS/FED-EX. Under the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for receipt on the same day in the ordinary course of business. Such envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for in accordance with ordinary business practices.

(**BY MAIL**) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit.

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

Executed on October 12, 2021, at Long Beach, California.

  
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Laura Palmerin

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