23 24	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity; GLENDALE CITY CLERK SUZIE ABAJIAN, in her official capacity; and DOES 1-10, Defendants.	Courtroom: 6C Judge: Hon. Stanley Blumenfeld Jr.
23 24 25 26 27 -	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity; GLENDALE CITY CLERK SUZIE ABAJIAN, in her official capacity; and DOES 1-10,	Courtroom: 6C
23 24 25 26	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity; GLENDALE CITY CLERK SUZIE ABAJIAN, in her official capacity; and DOES 1-10,	Courtroom: 6C
23 24 25	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity; GLENDALE CITY CLERK SUZIE ABAJIAN, in her official capacity; and DOES 1-10,	Courtroom: 6C
23 24	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity; GLENDALE CITY CLERK SUZIE ABAJIAN, in her official capacity; and	Courtroom: 6C
23	CITY OF GLENDALE; GLENDALE CHIEF OF POLICE CARL POVILAITIS, in his official capacity:	Courtroom: 6C
23	CITY OF GLENDALE; GLENDALE	Courtroom: 6C
		Courtroom: 6C
22	V.	Hearing Time: 8:30 a.m.
21	Plaintiffs,	Hearing Date: December 2, 2022
	OF CALIFORNIA, INC,	<b>REQUEST FOR JUDICIAL NOTICE</b>
10	THE SECOND AMENDMENT FOUNDATION; and GUN OWNERS	PLAINTIFFS' EVIDENTIARY OBJECTIONS TO DEFENDANTS'
1.0	CALIFORNIA RIFLE & PISTOL ASSOCIATION, INCORPORATED;	CASE NO: 2:22-cv-07346-SB-JC
17	WESTERN	DIVISION
16	CENTRAL DISTRIC	CT OF CALIFORNIA
15	IN THE UNITED STAT	TES DISTRICT COURT
	Attorney for Plaintiff The Second Amend	ment Foundation
-	Email: <u>Don@DKLawOffice.com</u>	
Ċ	Caldwell, Idaho 83607 Celephone: (408) 264-8489	
Ī	Law Offices of Donald Kilmer, APC 4085 Silver Ridge Road	
1.0	Owners of California, Inc. Donald Kilmer-SBN 179986	
	Attorneys for Plaintiffs California Rifle &	Pistol Association, Incorporated and Gun
7 F	Facsimile: (562) 216-4445 www.michellawyers.com	
6 I 7	Long Beach, CA 90802 Telephone: (562) 216-4444	
$5   \mathbf{N}   1$	MICHEL & ASSOCIATES, P.C. 80 E. Ocean Blvd., Suite 200	
4 7 a	Alexander A. Frank – SBN 311718 Ifrank@michellawyers.com	
3 K	Konstadinos T. Moros – SBN 306610 moros@michellawyers.com	
i	oshua Robert Dale – SBN 209942 dale@michellawyers.com	
c	C. D. Michel – SBN 144258 michel@michellawyers.com	

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:
Plaintiffs submit the following evidentiary objections to Defendants' Request
for Judicial Notice submitted in opposition to Plaintiffs' motion for preliminary
injunction:

5		
6	MATTER TO WHICH	<b>BASIS FOR EVIDENTIARY</b>
7	<b>EVIDENTIARY OBJECTION IS</b>	OBJECTION
8	ASSERTED	
9	1. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
10	Notice, item No. 26	allows the Court to take judicial
1		notice of adjudicative facts that are
2		not subject to reasonable dispute
3		because the facts rely on sources
4		whose accuracy cannot reasonably
5		be questioned.
6		
7		Item No. 26 is not eligible for
8		judicial notice because its
9		contentions are subject to
20		reasonable dispute and <b>cannot</b> be
1		readily determined to be accurate by
2		resorting to sources whose accuracy
3		cannot reasonably be questioned.
4		
25		Sustained:
6		Overruled:
27		
28		
	2 PLAINTIFFS' OBJECTION TO DEFEND	OANTS' REQUEST FOR JUD. NOTICE 2:22-cv-07346-SB-JC

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2.	Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
	Notice, item No. 27	allows the Court to take judicial
		notice of adjudicative facts that are
		not subject to reasonable dispute
		because the facts rely on sources
		whose accuracy cannot reasonably
		be questioned.
		Item No. 27 is not eligible for
		judicial notice because its
		contentions are subject to
		reasonable dispute and <b>cannot</b> be
		readily determined to be accurate by
		resorting to sources whose accuracy
		cannot reasonably be questioned.
		Sustained:
		Overruled:
3.	Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
	Notice, item No. 28	allows the Court to take judicial
		notice of adjudicative facts that are
		not subject to reasonable dispute
		because the facts rely on sources
		whose accuracy cannot reasonably
		be questioned.
		Item No. 28 is not eligible for
		judicial notice because its
	3	

1		contentions are subject to
1		contentions <b>are</b> subject to
2		reasonable dispute and <b>cannot</b> be
3		readily determined to be accurate by
4		resorting to sources whose accuracy
5		cannot reasonably be questioned.
6		
7		Sustained:
8		Overruled:
9	4. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
10	Notice, item No. 29	allows the Court to take judicial
11		notice of adjudicative facts that are
12		not subject to reasonable dispute
13		because the facts rely on sources
14		whose accuracy cannot reasonably
15		be questioned.
16		
17		Item No. 29 is not eligible for
18		judicial notice because its
19		contentions are subject to
20		reasonable dispute and <b>cannot</b> be
21		readily determined to be accurate by
22		resorting to sources whose accuracy
23		cannot reasonably be questioned.
24		
25		Sustained:
26		Overruled:
27		
28		
	4	
	PLAINTIFFS' OBJECTION TO DEFEN	DANTS' REQUEST FOR JUD. NOTICE 2:22-cv-07346-SB-JC

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1	5.	Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
2		Notice, item No. 30	allows the Court to take judicial
3			notice of adjudicative facts that are
4			not subject to reasonable dispute
5			because the facts rely on sources
6			whose accuracy cannot reasonably
7			be questioned.
8			
9			Item No. 30 is not eligible for
10			judicial notice because its
11			contentions are subject to
12			reasonable dispute and <b>cannot</b> be
13			readily determined to be accurate by
14			resorting to sources whose accuracy
15			cannot reasonably be questioned.
16			
17			Sustained:
18			Overruled:
19	6.	Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
20		Notice, item No. 31	allows the Court to take judicial
1			notice of adjudicative facts that are
2			not subject to reasonable dispute
3			because the facts rely on sources
4			whose accuracy cannot reasonably
25			be questioned.
26			
27			Item No. 31 is not eligible for
28			judicial notice because its
	PLA	5 INTIFFS' OBJECTION TO DEFENI	DANTS' REQUEST FOR JUD. NOTICE 2:22-cv-07346-SB-JC

1		contentions <b>are</b> subject to
2		reasonable dispute and <b>cannot</b> be
3		readily determined to be accurate by
4		resorting to sources whose accuracy
5		cannot reasonably be questioned.
6		
7		Sustained:
8		Overruled:
9	7. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
10	Notice, item No. 32	allows the Court to take judicial
11		notice of adjudicative facts that are
12		not subject to reasonable dispute
13		because the facts rely on sources
14		whose accuracy cannot reasonably
15		be questioned.
16		
17		Item No. 32 is not eligible for
18		judicial notice because its
19		contentions are subject to
20		reasonable dispute and <b>cannot</b> be
21		readily determined to be accurate by
22		resorting to sources whose accuracy
23		cannot reasonably be questioned.
24		
25		Sustained:
26		Overruled:
27		
28		
-	6 PLAINTIFFS' OBJECTION TO DEFEND	DANTS' REQUEST FOR JUD. NOTICE
		2:22-cv-07346-SB-JC

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Notice, item No. 33	allows the Court to take judicial
	5
	notice of adjudicative facts that are
	not subject to reasonable dispute
	because the facts rely on sources
	whose accuracy cannot reasonably
	be questioned.
	Item No. 33 is not eligible for
	judicial notice because its
	contentions are subject to
	reasonable dispute and <b>cannot</b> be
	readily determined to be accurate by
	resorting to sources whose accuracy
	cannot reasonably be questioned.
	Sustained:
	Overruled:
9. Defendants' Reques	st for Judicial Federal Rule of Evidence 201(b)
Notice, item No. 34	allows the Court to take judicial
	notice of adjudicative facts that are
	not subject to reasonable dispute
	because the facts rely on sources
	whose accuracy cannot reasonably
	be questioned.
	Item No. 34 is not eligible for
	judicial notice because its

1		contentions <b>are</b> subject to
2		reasonable dispute and <b>cannot</b> be
2		readily determined to be accurate by
4		resorting to sources whose accuracy
т 5		cannot reasonably be questioned.
6		cannot reasonably be questioned.
0 7		Sustained:
8		Overruled:
9	10. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
10	Notice, item No. 35	allows the Court to take judicial
11		notice of adjudicative facts that are
12		not subject to reasonable dispute
12		because the facts rely on sources
14		whose accuracy cannot reasonably
15		be questioned.
16		de questioned.
17		Item No. 35 is not eligible for
18		judicial notice because its
19		contentions <b>are</b> subject to
20		reasonable dispute and <b>cannot</b> be
21		readily determined to be accurate by
22		resorting to sources whose accuracy
23		cannot reasonably be questioned.
24		
25		Sustained:
26		Overruled:
27		
28		
	8	
	PLAINTIFFS' OBJECTION TO DEFENI	DANTS' REQUEST FOR JUD. NOTICE 2:22-cv-07346-SB-JC

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1	11. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
2	Notice, item No. 36	allows the Court to take judicial
3		notice of adjudicative facts that are
4		not subject to reasonable dispute
5		because the facts rely on sources
6		whose accuracy cannot reasonably
7		be questioned.
8		
9		Item No. 36 is not eligible for
10		judicial notice because its
11		contentions are subject to
12		reasonable dispute and <b>cannot</b> be
13		readily determined to be accurate by
14		resorting to sources whose accuracy
15		cannot reasonably be questioned.
16		
17		Sustained:
18		Overruled:
19	12. Defendants' Request for Judicial	Federal Rule of Evidence 201(b)
20	Notice, item No. 37	allows the Court to take judicial
21		notice of adjudicative facts that are
22		not subject to reasonable dispute
23		because the facts rely on sources
24		whose accuracy cannot reasonably
25		be questioned.
26		
27		Item No. 37 is not eligible for
28	9	judicial notice because its
	9 PLAINTIFFS' OBJECTION TO DEFENI	DANTS' REQUEST FOR JUD. NOTICE 2:22-cv-07346-SB-JC

1		contentions are subject to
2		reasonable dispute and <b>cannot</b> be
3		readily determined to be accurate by
4		resorting to sources whose accuracy
5		cannot reasonably be questioned.
6		
7		Sustained:
8		Overruled:
9		
10	Dated: November 9, 2022 MICH	EL & ASSOCIATES, P.C.
11		D. Michel
12	Attorne Pistol A	D. Michel eys for Plaintiffs California Rifle & Association, Incorporated and Gun s of California, Inc.
13		
14		offices of Donald Kilmer, APC
15	Attorne	ald Kilmer ey for Plaintiff The Second Iment Foundation
16	Americ	
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	PLAINTIFFS' OBJECTION TO DEFENDA	NTS' REQUEST FOR JUD. NOTICE
		2:22-cv-0/346-SB-JC

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1	CERTIFICATE OF SERVICE
2	IN THE UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA
3	Case Name: <i>California Rifle and Pistol Association, v. City of Glendale, et al.</i> Case No.: 2:22-cv-07346-SB-JC
4 5	IT IS HEREBY CERTIFIED THAT:
5 6	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
7	Beach, California 90802.
8	I am not a party to the above-entitled action. I have caused service of:
9	PLAINTIFFS' EVIDENTIARY OBJECTIONS TO DEFENDANTS' REQUEST FOR JUDICIAL NOTICE
10 11	on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.
11	Michael J. Garcia, City Attorney Edward B. Kang, Principal Assistant City Attorney
13	ekang@glendaleca.gov 613 E. Broadway, Suite 220
14	Glendale, CA 91206 Attorney for Defendants
15	I declare under penalty of perjury that the foregoing is true and correct.
16	Executed November 9, 2022.
17	Christina Castron
18	
19	
20	
21	
22	
23 24	
24	
26	
27	
28	
-	
	CERTIFICATE OF SERVICE 2:22-cv-07346-SB-JC