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15 **IN THE UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **WESTERN DIVISION**

18 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
19 THE SECOND AMENDMENT
FOUNDATION; and GUN OWNERS
20 OF CALIFORNIA, INC.,

21 Plaintiffs,

22 v.

23 CITY OF GLENDALE; GLENDALE
CHIEF OF POLICE CARL
24 POVILAITIS, in his official capacity;
GLENDALE CITY CLERK SUZIE
25 ABAJIAN, in her official capacity; and
DOES 1-10,
26

27 Defendants.
28

CASE NO: 2:22-cv-07346-SB-JC

**DECLARATION OF JOSHUA
ROBERT DALE IN SUPPORT OF
REPLY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

**Hearing Date: December 2, 2022
Hearing Time: 8:30 a.m.
Courtroom: 6C
Judge: Hon. Stanley Blumenfeld Jr.**

1 I, Joshua Robert Dale, declare:

2 1. I am a member of the bars of the State of California and State of
3 Nevada. I am an attorney at law duly licensed to practice in the State of California
4 and before the District Court for the Central District of California. I am counsel of
5 record for Plaintiffs California Rifle and Pistol Association, Incorporated and Gun
6 Owners of California, Inc. in this action. I submit this declaration in support of
7 Plaintiffs' Reply Brief in Support of Plaintiffs' Motion for Preliminary Injunction
8 in this matter. I have personal knowledge of the facts stated below, and if I were to
9 be called as a witness, I could and would competently testify under oath as to the
10 matters herein.

11 2. I have a valid license to carry a concealed firearm, issued to me by the
12 Orange County Sheriff. I have held this license since approximately 2016.

13 3. I am also a dues-paying member of one of my clients, California Rifle
14 & Pistol Association, Incorporated. I have been a member since approximately
15 2006, and my membership predates any legal representation of them in this or any
16 other legal matter.

17 4. When I travel in Los Angeles County, I carry concealed for self
18 defense a .40 Smith & Wesson pistol or a .40 Glock pistol.

19 5. I have personal friends who live in and around Glendale, whom my
20 family and I visit on occasion. When we visit them, we often dine out at restaurants
21 in Glendale. My visits to Glendale also include dining at restaurants like Porto's
22 Bakery on Brand Boulevard and Damon's Steakhouse, also on Brand Boulevard. I
23 have shopped for a car at the Toyota of Glendale within the past year. There are
24 several parking lots and garages I have parked in near these businesses when I have
25 patronized them, but I do not know whether they are privately owned or owned by
26 the City.

27 6. When I have visited friends, dined in Glendale, or patronized other
28 businesses, I would have carried a concealed pistol during these outings for self

1 defense and defense of my family but for the desire not to risk violating the
2 ordinances challenged in this lawsuit and thereby subjecting myself to having my
3 concealed carry weapons license revoked. I intend to continue to travel to Glendale
4 in the future to visit friends and patronize businesses, and would carry a concealed
5 pistol but for the desire not to risk violating the ordinances challenged.

6 I declare under penalty of perjury of the laws of the State of California and
7 the United States that the foregoing is true and correct. Executed within the United
8 States on November 9, 2022.

9 *s/Joshua Robert Dale*
10 Joshua Robert Dale, declarant

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *California Rifle and Pistol Association, v. City of Glendale, et al.*
Case No.: 2:22-cv-07346-SB-JC

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:

**DECLARATION OF JOSHUA ROBERT DALE IN SUPPORT OF REPLY
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Michael J. Garcia, City Attorney
Edward B. Kang, Principal Assistant City Attorney
ekang@glendaleca.gov
613 E. Broadway, Suite 220
Glendale, CA 91206
Attorney for Defendants

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

Executed November 9, 2022.


Christina Castron