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12 UNITED STATES DISTRICT COURT  
13 SOUTHERN DISTRICT OF CALIFORNIA

14 SOUTH BAY ROD & GUN CLUB, INC.;  
15 GARY BRENNAN, an individual;  
16 CORY HENRY, an individual;  
17 PATRICK LOVETTE, an individual;  
18 VIRGINIA DUNCAN, an individual;  
19 RANDY RICKS, an individual;  
20 CITIZENS COMMITTEE FOR THE  
21 RIGHT TO KEEP AND BEAR ARMS;  
22 GUN OWNERS OF CALIFORNIA;  
23 SECOND AMENDMENT LAW CENTER  
24 and CALIFORNIA RIFLE & PISTOL  
25 ASSOCIATION, INCORPORATED,

26 Plaintiffs,

27 vs.

28 ROBERT BONTA, in his official capacity  
as Attorney General of the State of  
California; and DOES 1-10,

Defendants.

No.: 3:22-cv-1461-BEN-JLB

**DECLARATION OF DAVID SAPP IN  
SUPPORT OF MOTION FOR LEAVE  
TO INTERVENE**

Hearing:

Date: January 5, 2023

Time:

Crtrm.: 5A (5th Floor)

Judge: The Honorable Roger T. Benitez

**DECLARATION OF DAVID SAPP**

I, David Sapp, declare under penalty of perjury that:


1. I am the Chief Deputy Legal Affairs Secretary in the Office of Governor Gavin Newsom. Tracking developments in this litigation is among my job responsibilities. As such, I have personal knowledge of the facts stated herein.

2. Governor Newsom was the sponsor of Senate Bill 1327, a provision of which is at issue in this litigation, and ultimately signed it into law after the bill passed both houses of the California Legislature.

3. On December 7, 2022, our office received communication from California Attorney General’s Office reflecting that they were not going to defend the constitutionality of California Code of Civil Procedure section 1021.11 in this litigation.

4. Upon receiving this information, our office initiated steps to secure outside counsel to represent Governor Newsom as a proposed intervenor in this litigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on December 8, 2022, at Napa, California.

  
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David Sapp

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