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9 California Rifle & Pistol Association,
Incorporated

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **SOUTHERN DIVISION**

14 LANCE BOLAND, an individual;
MARIO SANTELLAN, an individual;
15 RENO MAY, an individual; JEROME
SCHAMMEL, an individual;
16 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED, a
17 California corporation,

18 Plaintiffs,

19 v.

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

22 Defendants.

Case No. 8:22-cv-01421-CJC(ADSx)

**DECLARATION OF MICHAEL
HOLLEY, PRESIDENT AND
MANAGING DIRECTOR OF
HECKLER & KOCH USA, IN
SUPPORT OF PLAINTIFFS'
PRELIMINARY INJUNCTION
REPLY**

DECLARATION OF MICHAEL HOLLEY

I, Michael Holley, declare as follows:

1. I, Michael Holley, submit this declaration in support of Plaintiffs' reply in support of their motion to preliminarily enjoin aspects of California's Unsafe Handgun Act (the "UHA"), otherwise known as the "Roster" of handguns. I make this declaration of my own personal knowledge, and if call as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a resident of the state of Georgia.

3. I work for Heckler & Koch USA, which is a German firearms company that designs and produces firearms and accessories for militaries, law enforcement agencies, and civilians worldwide. HK USA's firearms are sold in California. My job title is President and Managing Director. My responsibilities include all aspects of HK firearms in the USA for Military, LE, and civilian markets.

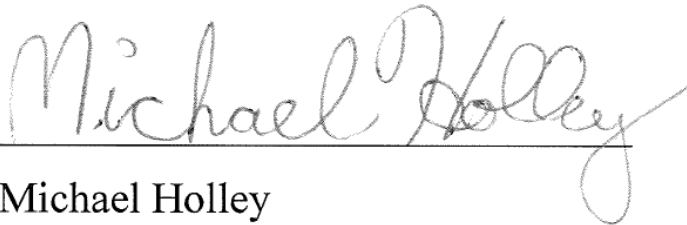
4. Due to my role at HK USA, I am familiar with California's UHA, and the requirements and procedures for getting handguns admitted to the roster.

5. The last time that HK USA submitted a semiautomatic handgun to a California certified laboratory for drop-safety testing was in 2006-2007. The model was the P2000 variant and the process at that time took roughly two weeks to be completed.

6. HK USA's range of semiautomatic centerfire handguns includes many models that are not on the Roster as of December of 2022. One of these models is the VP9 series, which features the ability to configure the magazine release and slide release ambidextrously. I would personally oversee the immediate submission of those VP9 variants, and many others, to the laboratories for drop-safety testing if this Court preliminarily enjoins enforcing the other requirements for admission to the Roster pending the ultimate resolution of this lawsuit on the merits.

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1 I declare under penalty of perjury of the laws of the State of California and the
2 United States that the foregoing is true and correct. Executed within in the United States
3 on December 12, 2022.

4
5
6 
7
8 Michael Holley

CERTIFICATE OF SERVICE

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Boland, et al. v. Bonta*

Case No.: 8:22-cv-01421-CJC(ADSx)

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 MICHAEL HOLLEY, PRESIDENT AND MANAGING
DIRECTOR OF HECKLER & KOCH USA, IN SUPPORT OF PLAINTIFFS'
PRELIMINARY INJUNCTION REPLY**
on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

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Los Angeles, CA 90013-1230

I declare under penalty of perjury that the foregoing is true and correct.
Executed December 12, 2022.


Christina Castron