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12 Attorneys for Plaintiffs

13 **UNITED STATES DISTRICT COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 Lana Rae Renna; Danielle Jaymes; Laura  
16 Schwartz; Michael Schwartz; Robert  
Macomber; Clint Freeman; John Klier;  
17 Justin Smith; John Phillips; Cheryl  
Prince; Darin Prince; Ryan Peterson;  
18 PWGG, L.P.; North County Shooting  
Center, Inc.; Gunfighter Tactical, LLC;  
19 Firearms Policy Coalition, Inc.; San  
Diego County Gun Owners PAC;  
20 Citizens Committee for the Right to  
Keep and Bear Arms; and Second  
21 Amendment Foundation,

22 Plaintiffs,

23 v.

24 Robert Bonta, Attorney General of  
California; and Luis Lopez, Director of  
25 the California Department of Justice  
Bureau of Firearms,  
26

27 Defendants.  
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Case No.: 20-cv-2190-DMS-DEB

**DECLARATION OF LANA RAE  
RENNA IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION**

Date:  
Time:  
Courtroom 13A (13th Floor)  
Hon. Dana M. Sabraw

1 I, Lana Rae Renna, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and  
3 would be able to testify competently to these facts if called as a witness.

4 2. I am not prohibited under state or federal law from possessing, receiving,  
5 owning, or purchasing a firearm.

6 3. I am a member and supporter of Plaintiffs FIREARMS POLICY  
7 COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS  
8 COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND  
9 AMENDMENT FOUNDATION.

10 4. But for California’s Handgun Ban and Defendants’ active enforcement  
11 thereof, I would purchase for self-defense and other lawful purposes a Smith &  
12 Wesson M&P® 380 SHIELD™ EZ®, which is a handgun in common use for self-  
13 defense and other lawful purposes and widely sold and possessed outside of  
14 California. I have a damaged tendon in my right thumb that impacts my ability to  
15 apply physical force.

16 5. The Smith & Wesson M&P® 380 SHIELD™ EZ® is specifically  
17 designed for those with limited hand strength. I would be able to use this gun more  
18 safely and accurately than the guns currently available to purchase on Defendants’  
19 Roster.

20 6. Because the handgun that I seek to purchase for lawful purposes is  
21 currently excluded from Defendants’ Roster of purportedly “not unsafe” handguns,  
22 California’s Handgun Ban bars me from purchasing and taking possession of it from  
23 a licensed retailer, who are likewise prohibited from selling them to me on pain of  
24 criminal sanction.


25 7. Other than buying this handgun through a licensed retailer, I have no  
26 other lawful method of purchasing these handguns in California.

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I declare under penalty of perjury under the laws of the United States America and State of California that the foregoing is true and correct. Executed December 21, 2022.

  
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LANARAE RENNA