

C.D. Michel – SBN 144258
cmichel@michellawyers.com
Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
Sean A. Brady – SBN 262007
sbrady@michellawyers.com
Alexander A. Frank – SBN 311718
afrank@michellawyers.com
Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Boulevard, Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Facsimile: (562) 216-4445

Attorneys for Plaintiffs Lance Boland, Mario
Santellan, Reno May, Jerome Schammel, and
California Rifle & Pistol Association,
Incorporated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

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

Plaintiff,

v.

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

Defendants.

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

**DECLARATION OF SEAN A.
BRADY IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION TO ALLOW
REMOTE TESTIMONY OF
STEPHEN HELSLEY, SALAM
FATOHI, AND CLAYTON CRAMER**

DECLARATION OF SEAN A. BRADY

I, Sean A. Brady, declare:

1. I am a member of the bars of the State of California. I am an attorney at law, duly licensed to practice in the State of California and before the United States District Court for the Central District of California. My law firm, Michel & Associates, P.C., is counsel of record for Plaintiffs in this action. I submit this declaration in support of Plaintiffs' ex parte application to allow Stephen Helsley, Salam Fatohi, and Clayton Cramer to appear and testify remotely at the January 23, 2023, hearing of Plaintiffs' motion for preliminary injunction.

2. I contacted Stephen Helsley about being an expert witness in this matter. Mr. Helsley informed me that he is currently suffering some physical-mobility limitations that will preclude his traveling to Orange County in person on January 23, 2023.

3. I contacted Salam Fatohi about being an expert witness in this matter. Mr. Fatohi explained that he lives in Farmington Hills, Michigan, and will be in Las Vegas, Nevada, for work obligations from January 15, 2023, through January 19, 2023, and then will travel back to Michigan for work on personal matters on Friday, January 20. Due to work and family obligations, flying all the way back to the west coast on Sunday the 22nd to testify in person on the 23rd would be extremely burdensome.

4. I contacted Clayton Cramer about being an expert witness in this matter. Mr. Cramer explained to me that he will not be able to travel from his home near Boise, Idaho to California on January 23, due to health conditions that could affect his ability to testify being exacerbated by long distance travel.

5. On January 17, 2023, I emailed Gabrielle Boutin, the Deputy Attorney General handling this matter for the Attorney General, to inform her that Plaintiffs would be filing their motion seeking the herein described ex parte relief the following day. Ms. Boutin responded via email and said the state would not oppose the request.

6. On January 18, 2023, I emailed Ms. Boutin all moving papers filed in support of this ex parte request. Ms. Boutin's email address is

1 Gabrielle.Boutin@doj.ca.gov. Ms. Boutin's state bar profile indicates that her mailing
2 address is: Office of the Attorney General, PO Box 944255, Sacramento, CA 94244, and
3 phone number is (916) 210 6053.

4 7. Given the timing of the January 23, 2023 hearing being ordered in December
5 and the recent finalization of these individuals' agreements to serve as expert witnesses in
6 this matter, a regularly noticed motion for the relief requested herein was not possible.

7
8 I declare under penalty of perjury of the laws of the State of California and the
9 United States that the foregoing is true and correct. Executed within the United States on
10 January 18, 2023.

11
12 *s/Sean A. Brady*

13 Sean A. Brady, declarant
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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 SEAN A. BRADY IN SUPPORT OF PLAINTIFFS' EX PARTE APPLICATION TO ALLOW REMOTE TESTIMONY OF STEPHEN HELSLEY, SALAM FATOHI, AND CLAYTON CRAMER

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

Robert L. Meyerhoff, Deputy Attorney General

robert.meyerhoff@doj.ca.gov

Gabrielle D. Boutin

Gabrielle.Boutin@doj.ca.gov

Charles J. Sarosy

charles.sarosy@doj.ca.gov

300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230

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

Executed January 18, 2023.


Christina Castron