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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

WILLIAM WIESE, et al.,

Plaintiffs,

vs.

ROB BONTA, in his official capacity as
Attorney General of California, et al.,

Defendants.

Case No. 2:17-cv-00903-WBS-KJN

**DECLARATION OF ALAN GOTTLIEB IN
SUPPORT OF PLAINTIFFS' MOTION AND
MOTION FOR SUMMARY JUDGMENT**

[FRCP 56]

Date: None Set

Judge: Hon. William B. Shubb

DECLARATION OF ALAN GOTTLIEB

I, Alan Gottlieb, declare as follows:

1. I am the Executive Vice President and founder of plaintiff Second Amendment Foundation ("SAF"), an organizational plaintiff in this matter. I have personal knowledge of the facts stated herein, and if called as a witness could competently testify thereto. This declaration is executed in support of Plaintiffs' Motion for Summary Judgment.

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2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 720,000 members and supporters nationwide, including California. The purposes of SAF include education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control. The Court’s interpretation of the laws and rights at stake in this case impacts members and supporters who reside in or visit California.

3. The relief that the plaintiffs seek in this lawsuit is germane and directly related to SAF’s purposes, and SAF is thus suing on behalf of its members, including the individual Plaintiffs in this case, who are members of SAF.

4. Most SAF members are ordinary, peaceable individuals who do not qualify for any exception to the State’s prohibition on the possession of “large-capacity” magazines.

5. The State’s enforcement of its ban on so-called “large-capacity” firearm magazines—standard magazines that hold more than ten (10) rounds (cartridges) or ammunition—adversely affects SAF members in the exercise of their right to keep and bear arms for self-defense and other lawful purposes in the State, including those who are existing gunowners and already have lawfully purchased and possessed “large-capacity” firearm magazines, gunowners who do not have such magazines, and gunowner visitors to California who have such magazines but cannot bring them into the State.

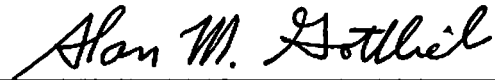
6. SAF’s members and similarly situated gunowners who reside in or visit California overwhelmingly desire and intend to acquire, keep, and bear “large-capacity” firearm magazines for self-defense and other lawful purposes in California, and would do so, but for the State’s laws challenged in this case and its enforcement of them.

7. Removing from the State, or selling magazines already in individuals’ possession outside of the State, would adversely affect SAF’s members’ right to keep and bear arms for self-defense and other lawful purposes as well as their property rights.

8. Unless the enforcement of the State’s “large-capacity” magazine ban laws is

1 declared unconstitutional and enjoined, SAF's members will suffer a physical deprivation of
2 property that is both independently valuable and a necessary part of a functional firearm.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on
4 March 24, 2023.

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7 Alan Gottlieb

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