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 8 *Attorneys for Defendants Rob Bonta in his official
 capacity as Attorney General of the State of California
 9 and Allison Mendoza in her Official Capacity as
 Director of the Bureau of Firearms*

10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE EASTERN DISTRICT OF CALIFORNIA
 12 SACRAMENTO DIVISION
 13

14
 15 **WILLIAM WIESE, et al.,**

16 Plaintiffs,

17 v.

18 **ROB BONTA, et al.,**

19 Defendants.
 20

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

**DECLARATION OF ROBERT L.
 MEYERHOFF IN SUPPORT OF
 DEFENDANTS' OPPOSITION TO
 PLAINTIFFS' MOTION FOR
 SUMMARY JUDGMENT AND
 COUNTER-MOTION FOR SUMMARY
 JUDGMENT**

Date: October 30, 2023
 Time: 1:30 p.m.
 Courtroom: 5, 14th Floor
 Judge: Hon. William B. Shubb

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DECLARATION OF ROBERT L. MEYERHOFF

I, Robert L. Meyerhoff, declare under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen (18) years, competent to testify to the matters contained in this declaration, and testify based on my personal knowledge and information.

2. I am a Deputy Attorney General with the California Department of Justice, and serve as counsel to Defendants Rob Bonta in his official capacity as Attorney General of the State of California and Allison Mendoza in her Official Capacity as Director of the Bureau of Firearms (“Defendants”).

3. On July 11, 2023, Defendants deposed Sherman Macaston. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of Sherman Macaston is attached as Exhibit A.

4. On July 12, 2023, Defendants deposed Todd Nielsen. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of Todd Nielsen is attached as Exhibit B.

5. On July 13, 2023, Defendants deposed Clifford Flores. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of Clifford Flores is attached as Exhibit C.

6. On July 14, 2023, Defendants deposed Frank Federau. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of Frank Federau is attached as Exhibit D.

7. On July 17, 2023, Defendants deposed Jeremiah Morris. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of Jeremiah Morris is attached as Exhibit E.

8. On July 18, 2023, Defendants deposed D. Allen Youngman. A true and correct copy of relevant excerpts of the Reporter’s Transcript of the Deposition of D. Allen Youngman is attached as Exhibit F.

1 9. On July 20, 2023, Defendants deposed William Wiese. A true and correct copy of
2 relevant excerpts of the Reporter's Transcript of the Deposition of William Wiese is attached as
3 Exhibit G.

4 10. On August 3, 2023, Defendants deposed James Curcuruto. A true and correct copy of
5 relevant excerpts of the Reporter's Transcript of the Deposition of James Curcuruto is attached as
6 Exhibit H.

7 11. On July 27, 2023, Defendants deposed Luang X. Dang. A true and correct copy of
8 relevant excerpts of the Reporter's Transcript of the Deposition of Luang X. Dang is attached as
9 Exhibit I.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed on August 18, 2023, at Los Angeles, CA.

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/s/ Robert L. Meyerhoff
Robert L. Meyerhoff

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
SHERMAN MACASTON**

DATE: Tuesday, July 11, 2023

REPORTER: Lauren Jones Jackson, CSR No. 7007/RPR

VIA REMOTE VIDEO TECHNOLOGY



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4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE EASTERN DISTRICT OF CALIFORNIA
6 SACRAMENTO DIVISION
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8 WILLIAM WIESE, et al.,) Case No. 2:17-cv-00903-WBS-KJN
9 Plaintiffs,)
10 vs.)
11 ROB BONTA, et al.,)
12 Defendants.)
13 _____)

14 REMOTE DEPOSITION OF
15 SHERMAN MACASTON
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18
19 Tuesday, July 11, 2023
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23 LAUREN JONES JACKSON
24 CERTIFIED SHORTHAND REPORTER NO. 7007, RPR
25

1 Deposition of SHERMAN MACASTON,
2 taken remotely via Zoom video
3 conferencing on behalf of the
4 Defendants on Tuesday,
5 July 11, 2023, at 9:05 A.M., before
6 Lauren Jones Jackson, CSR No. 7007.

7
8 APPEARANCES:

9 For the Plaintiffs:

10 SEILER EPSTEIN ZIEGLER & APPLGATE LLP
11 BY: GEORGE M. LEE, ESQ.
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16 gml@seilerepstein.com

17 And

18 LAW OFFICES OF RAYMOND MARK DIGUISEPPE,
19 PLLC
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25 law.rmd@gmail.com

For the Defendants:

26 CALIFORNIA DEPARTMENT OF JUSTICE
27 BY: ROBERT L. MEYERHOFF, ESQ.
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29 Suite 1702
30 Los Angeles, California 90013
31 (213) 269-6177
32 robert.meyerhoff@doj.ca.gov

1 A. Correct.

2 Q. So for the other nine firearms you possess, you
3 only own magazines that accept ten rounds or less?

4 A. Correct.

5 Q. On average, how many magazines do you own for
6 each of those nine firearms?

7 A. On an average, would probably be ten.

8 Q. So you own a total of 90 magazines or -- I'll
9 rephrase.

10 You own approximately 90 magazines that accept
11 ten rounds or less; correct?

12 A. No. I have approximately 55 to 60 magazines that
13 accept 10 rounds or less.

14 Q. So for each firearm, you have an average around
15 seven magazines; correct?

16 A. It would be more of a closer average to seven.
17 Some -- some of my --

18 Some of them, I only have three or four
19 magazines. Others, I have twelve or fourteen.

20 Q. And for these firearms, these nine firearms, why
21 do you not have large-capacity magazines?

22 A. On several of them, large capacity -- to give you
23 an idea of 45 caliber pistols -- they -- the best -- the
24 highest capacity they come with is eight.

25 Q. Why is that?

1 A. The -- the butt of the gun is not big enough to
2 handle a magazine larger than that.

3 Q. How many 45 caliber pistols do you own?

4 A. Two.

5 Q. And what do you use those 45 caliber pistols for?

6 A. Target practice; shooting holes in paper;
7 self-defense.

8 Q. And how do you use those 45 caliber pistols for
9 self-defense?

10 A. Well, I haven't had to. Thank you. But if
11 necessary, I would be capable of it.

12 Q. Are those 45 caliber pistols semiautomatic?

13 A. Yes, they are.

14 Q. And how would you use those pistols in
15 self-defense?

16 MR. LEE: Objection. Lacks foundation.
17 Calls for speculation. I don't know that I understand
18 the question from counsel.

19 BY MR. MEYERHOFF:

20 Q. Mr. Macaston, you testified that you could use an
21 eight --

22 You testified you could use a 45 caliber pistol
23 in self-defense; correct?

24 A. Correct.

25 Q. And 45 caliber pistols are only capable of

1 I, LAUREN JONES JACKSON, Certified Shorthand
2 Reporter qualified in and for the State of California,
3 do hereby certify:

4 That the foregoing transcript is a true and
5 correct transcription of my original stenographic notes.

6 I further certify that I am neither attorney or
7 counsel for, nor related to or employed by any of the
8 parties to the action in which this proceeding was
9 taken; and furthermore, that I am not a relative or
10 employee of any attorney or counsel employed by the
11 parties hereto or financially interested in the action.

12 IN WITNESS WHEREOF, I have hereunto set my hand
13 this 14th day of July, 2023.


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19 LAUREN JONES JACKSON
20 CSR No. 1007
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Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
TODD MICHAEL NIELSEN**

DATE: Wednesday, July 12, 2023

REPORTER: Allison Wong, CSR No. 13963

VIA REMOTE VIDEO TECHNOLOGY



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
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Plaintiffs,)
)
vs.) Case No. 2:17-cv-00903-
) WBS-KJN
ROB BONTA, et al.,)
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Defendants.)
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DEPOSITION OF
TODD MICHAEL NIELSEN
July 12, 2023
9:31 a.m.

via Zoom Videoconference

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Deposition of TODD MICHAEL NIELSEN, called as a witness by the Defendants, before ALLISON WONG, Certified Shorthand Reporter Number 13963, for the State of California, with principal office in the County of Los Angeles, commencing at 9:31 a.m., July 12, 2023, via Zoom videoconference.

* * *

APPEARANCES OF COUNSEL:

FOR THE PLAINTIFFS:

THE DIGUISEPPE LAW FIRM, P.C.
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FOR THE DEFENDANTS:

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BY: ROBERT L. MEYERHOFF, ESQ.
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(213)269-6177
robert.meyerhoff@doj.ca.gov

1 BY MR. MEYERHOFF:

2 Q. Did you do any research on whether there would
3 be a place you could store them outside of the state of
4 California?

5 A. Yes. I did.

6 MR. MEYERHOFF: I'm going to shift gears a little
7 bit. Do you need a break, Mr. Nielsen? Or are you --
8 you okay?

9 THE WITNESS: No. I'm okay.

10 MR. MEYERHOFF: Okay.

11 (Reporter inquiry.)

12 MR. MEYERHOFF: Sorry, Ms. Wong.

13 MR. DIGUISEPPE: Sure thing.

14 MR. MEYERHOFF: Of course. I'll just go on mute.

15 (Recess taken.)

16 MR. MEYERHOFF: Are we back on the record? Great.

17 BY MR. MEYERHOFF:

18 Q. Mr. Nielsen, we spoke about, earlier, the times
19 that you've discharged your firearm, a firearm while on
20 duty. I want to shift gears and ask a slightly
21 different question.

22 Have you ever discharged a firearm while not on
23 duty?

24 THE WITNESS: No.

25 MR. DIGUISEPPE: I'll insert an objection on

1 relevance grounds, the questions about the use of a
2 particular firearm or magazine or how many rounds have
3 been discharged in a given instance.

4 Other than that, you can answer.

5 THE WITNESS: I have not discharged one off duty.

6 BY MR. MEYERHOFF:

7 Q. Any type of firearm; correct?

8 A. Other than training, no.

9 Q. Have you ever been the victim of a crime?

10 A. Several times.

11 Q. What types of crimes?

12 A. Assaults, batteries, assault with a deadly
13 weapon, burglary.

14 Q. Have -- have any of these crimes occurred while
15 you were off duty?

16 A. Yes.

17 Q. How many of them?

18 A. Total of about seven.

19 Q. And why did you not discharge a firearm during
20 the course of any of these crimes?

21 MR. DIGUISEPPE: Objection. Irrelevant.

22 You can answer, if you can.

23 THE WITNESS: In most of them, like the burglary, I
24 was not there. The assaults, there wasn't a clean line
25 of fire for me to actually utilize my firearm. And then

1 County of Los Angeles,)
2 State of California,)

3
4 I, Allison Wong, Certified Shorthand Reporter
5 licensed in the State of California, License No. 13963,
6 hereby certify that the deponent was by me first duly
7 sworn and the foregoing testimony was reported by me and
8 was thereafter transcribed with Computer-Aided
9 Transcription; that the foregoing is a full, complete,
10 and true record of said proceeding.

11 I further certify that I am not of counsel or
12 attorney for either or any of the parties in the
13 foregoing proceeding and caption named or in any way
14 interested in the outcome of the cause in said caption.
15 The dismantling, unsealing, or unbinding of the
16 transcript will render the reporter's certificates null
17 and void.

18 In witness whereof, I have hereunto set my hand
19 this day: 15th of July.

20 Read and Signing was requested.

21 Reading and Signing was waived.

22 Reading and Signing was not requested.

23
24 
25 ALLISON WONG,
CSR No. 13963

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
CLIFFORD WAYNE FLORES**

DATE: Thursday, July 13, 2023

REPORTER: Karen I. Pearson-Bell, CSR No. 3557

VIA REMOTE VIDEO TECHNOLOGY



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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) No. 2:17-CV-00903-WBS-KJN
)
BOB BONTA, et al.,) Confidential section of
) this transcript is
Defendants.) bound separately, Pages
) 51-58

REMOTE DEPOSITION VIA ZOOM VIDEOCONFERENCE OF
CLIFFORD WAYNE FLORES

TAKEN WITH THE
DEPONENT LOCATED IN
MILPITAS, CALIFORNIA

THURSDAY, JULY 13, 2023

KAREN I. PEARSON-BELL, CSR
CERTIFICATE NO. 3557

1 Remote deposition via Zoom Videoconference of
2 CLIFFORD WAYNE FLORES, called as a witness by the
3 defendants, before Karen I. Pearson-Bell, Certified
4 Shorthand Reporter for the State of California, with
principal office in the County of Riverside, commencing
at 11:06 a.m., Thursday, July 13, 2023, with the
deponent located in Milpitas California.

5 - - -

6 * APPEARANCES OF COUNSEL:

7 For the Plaintiffs:

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13 For Defendants Rob Bonta in his official
14 capacity as Attorney General of the State of
California, and Allison Mendoza in her
15 official capacity as Director of the Bureau of
Firearms:

16 OFFICE OF THE ATTORNEY GENERAL OF CALIFORNIA
17 BY: ROBERT L. MEYERHOFF
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18 Los Angeles, California 90013-1230
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19 F: (213) 731-2144
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20

21 Also Present:

22 MARIE TRUBETSKAYA - Law Clerk
23

24 * Note: All appearances in the deposition were via
Zoom Videoconference except the deponent who
25 appeared via telephone only

1 Q. Other than at the shooting range and the time
2 that you shot the cat, have you ever discharged a
3 firearm?

4 A. I don't really recall.

5 Q. Have you ever discharged a firearm at another
6 person?

7 A. Never. No.

8 Q. Have you ever discharged a firearm near
9 another person in an effort to get them away from you?

10 A. No.

11 Q. Have you ever been the victim of a crime?

12 A. No.

13 Q. You testified previously that the largest
14 capacity magazine you own is 70 rounds. Is that
15 correct?

16 A. About 70 or 75, I believe, yeah.

17 Q. And based on the fact that you are suing the
18 State of California relating to that magazine, is it
19 fair to say that you believe that 70-round magazine
20 should not be restricted under California law?

21 A. Yes.

22 Q. Do you believe that hundred-round magazines
23 should be restricted under California law?

24 MR. LEE: Objection. Calls for an opinion.
25 You may answer, Mr. Flores.

1 STATE OF CALIFORNIA)
)
2 COUNTY OF RIVERSIDE)

3

4 I, KAREN I. PEARSON-BELL, Certified Shorthand
5 Reporter in and for the State of California do hereby
6 certify under the laws of the State of California:

7 That the foregoing transcript is a true and
8 correct transcription of my original stenographic
9 notes.

10 I further certify that I am neither attorney
11 or counsel for, nor related to or employed by any of
12 the parties to the action; and, furthermore, that I am
13 not a relative or employee of any attorney or counsel
14 employed by the parties hereto or financially
15 interested in the action.

16

17 IN WITNESS WHEREOF, I have hereunto set my
18 hand this 14th day of July, 2023.

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22

KAREN I. PEARSON-BELL
CSR NO. 3557/RPR

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Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
FRANK FEDERAU**

DATE: Friday, July 14, 2023

REPORTER: Cheryl S. Ortega, CSR No. 13709

VIA REMOTE VIDEO TECHNOLOGY



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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA
3 SACRAMENTO DIVISION
4

5 WILLIAM WEISE, ET AL,)
6)
7) PLAINTIFFS,)
8)
9) VS.) NO.
10) 2:17-CV-00903-WBS-)
11) ROB BONTA, ET AL,) KJN
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13) DEFENDANTS.)
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13 ZOOM DEPOSITION OF
14 FRANK FEDERAU
15 JULY 14, 2023
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25 REPORTED BY: CHERYL S. ORTEGA, CSR NO. 13709

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA
3 SACRAMENTO DIVISION
4

5 WILLIAM WEISE, ET AL,)
6 PLAINTIFFS,)
7 VS.) NO.
8 ROB BONTA, ET AL,) 2:17-CV-00903-WBS-
9 DEFENDANTS.) KJN
10 _____)
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16 ZOOM DEPOSITION OF FRANK FEDERAU, TAKEN BEFORE
17 CHERYL S. ORTEGA, CSR NO. 13709, A CERTIFIED COURT
18 REPORTER FOR THE STATE OF CALIFORNIA, COMMENCING AT 9:55
19 A.M., FRIDAY, JULY 14, 2023.
20
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1 APPEARANCES OF COUNSEL:

2

3 For the Plaintiffs:

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5 PLLC
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9 910-713-8804
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11 BY: MARK DIGUISEPPE, ESQ.

8

9 For the Defendants:

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12 SUITE 1702
13 LOS ANGELES, CALIFORNIA 90013
14 213.269.6177
15 JERRY.YEN@DOJ.CA.GOV
16 BY: JERRY YEN, ESQ.

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1 But you can answer the question if you can.

2 THE WITNESS: The answer is no.

3 BY MR. YEN:

4 Q. Have you ever discharged the firearm in
5 self-defense?

6 A. No.

7 MR. DIGUISEPPE: Same objection.

8 You got ahead of me on that question but the
9 objection is irrelevant when it comes to use of the arms
10 or the magazines.

11 You can continue.

12 BY MR. YEN:

13 Q. Has anyone in your household ever discharged a
14 firearm in self-defense?

15 MR. DIGUISEPPE: Same objection.

16 THE WITNESS: No.

17 MR. DIGUISEPPE: You can answer.

18 THE WITNESS: No.

19 BY MR. YEN:

20 Q. How many rounds would you think you need for
21 self-defense?

22 MR. DIGUISEPPE: Objection. Irrelevant.
23 Calling for speculation.

24 You can answer.

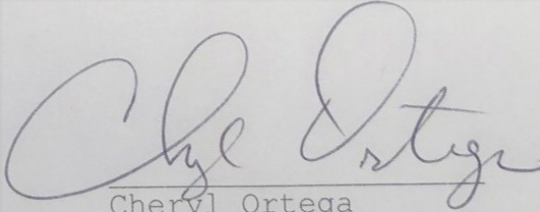
25 THE WITNESS: As many as it needs.

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I, CHERYL ORTEGA, Certified Shorthand Reporter for the State of California, do hereby certify:

That the proceeding was taken by me in machine shorthand and later transcribed into typewriting, under my direction, and that the foregoing contains a true record of the testimony of the witness.

Dated: This 14th of July, 2023 at San Bernardino, California.



Cheryl Ortega
CSR NO. 13709

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
JEREMIAH DANIEL MORRIS**

DATE: Monday, July 17, 2023

REPORTER: Allison Wong, CSR No. 13963

VIA REMOTE VIDEO TECHNOLOGY



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
)
 Plaintiffs,)
)
 vs.) Case No. 2:17-cv-00903-
)
 ROB BONTA, et al.,) WBS-KJN
)
 Defendants.)
_____)

DEPOSITION OF
JEREMIAH DANIEL MORRIS
July 17, 2023
11:30 a.m.

via Zoom Videoconference

1 Deposition of JEREMIAH DANIEL MORRIS, called as
2 a witness by the Defendants, before ALLISON WONG,
3 Certified Shorthand Reporter Number 13963, for the
4 State of California, with principal office in the
5 County of Los Angeles, commencing at 11:30 a.m.,
6 July 17, 2023, via Zoom videoconference.

7 * * *

8
9 APPEARANCES OF COUNSEL:

10
11 FOR THE PLAINTIFFS:

12 THE DIGUISEPPE LAW FIRM, P.C.
13 BY: RAYMOND MARK DIGUISEPPE, ESQ.
14 Post Office Box 10790
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16 FOR THE DEFENDANTS:

17 CALIFORNIA DEPARTMENT OF JUSTICE
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21 Los Angeles, California 90013-1256
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robert.meyerhoff@doj.ca.gov

1 reason while you were a member of the Marines?

2 A. No.

3 Q. Outside of your service in the Marines, have
4 you ever discharged a firearm?

5 A. Yes.

6 Q. Why?

7 A. Is the question why did I do it or what
8 activities I was conducting?

9 Q. What activities were you conducting when you
10 discharged a firearm outside of your Marine service?

11 A. Hunting, sport, target practice.

12 Q. Are there any reasons, other than hunting,
13 sport, and target practice, that you've discharged a
14 firearm outside of your service in the Marines?

15 A. Just, you know, additional CCW qualifiers.
16 That's about it.

17 Q. Anything else?

18 A. Not to my knowledge, no.

19 Q. What is the difference between hunting and
20 sport?

21 A. Hunting, you would be hunting a -- a live
22 animal. Sport, you would be maybe, you know, like trap,
23 skeet, or something like that, a sporting clays event.

24 Q. What type of live animals have you hunted?

25 MR. DIGUISEPPE: Objection. Irrelevant.

1 A. Yes.

2 Q. How many of those firearms accept detachable
3 magazines?

4 A. Right over half, maybe.

5 Q. Are the other half fixed magazines?

6 A. Yes.

7 Q. Do you own any revolvers?

8 A. Yes.

9 Q. How many revolvers do you own?

10 A. I think three right now.

11 Q. How many re- -- how many rounds are the
12 revolvers capable of firing before reloading?

13 A. Depends on which one. Actually -- yeah, so
14 just --

15 Q. What's the largest?

16 A. The largest is -- holds seven.

17 Q. What about the others?

18 A. Well, one's a six, and the other's a five.

19 Q. What about the fixed-magazine firearms? What's
20 the largest capacity of those?

21 A. Goodness. I don't -- I don't know. I haven't
22 thought about that in a long time or even used some of
23 those in a while. I really don't know.

24 Q. Do you think any of those fixed-magazine
25 firearms are capable of firing more than ten rounds

1 without reloading?

2 A. No. They're not.

3 Q. More than eight rounds without reloading?

4 A. I don't think so.

5 Q. Six rounds without reloading?

6 A. Probably in there -- in there.

7 Q. And for the detachable-magazine firearms you
8 possess, do you have large-capacity magazines for each
9 of those firearms?

10 A. No.

11 Q. So for some of the detachable-magazine firearms
12 you possess, the maximum magazine size is ten or less?

13 A. Yes.

14 Q. For those firearms, why have you not purchased
15 a large-capacity magazine?

16 A. They're not offered for sale in California.

17 Q. Why did you purchase the three revolvers you
18 own?

19 A. It was a decision I made.

20 Q. And what motivated that decision?

21 A. I like them.

22 Q. What do you like about them?

23 A. What do I like about them? Well, one, I didn't
24 purchase. It was handed down through the family. The
25 other -- the other two, I purchased because I -- one, I

1 Okay.

2 THE WITNESS: Correct.

3 MR. DIGUISEPPE: All right. Thanks.

4 BY MR. MEYERHOFF:

5 Q. How many years have you competed in the IDPA
6 for?

7 A. I haven't competed in a number of years, but
8 when I was competing, it was probably four or
9 five years.

10 Q. Does the IDPA only have competitions for
11 revolvers?

12 A. No.

13 Q. They have competition for detachable-magazine
14 firearms?

15 A. Correct.

16 Q. Why did you acquire the detachable-magazine
17 firearms you possess?

18 A. Just as a collector.

19 Q. Is there any reason, other than collection,
20 that you purchased your detachable-magazine firearms?

21 A. Well, we already stated the self-defense, the
22 shooting, you know, the -- you know, the hunting and
23 stuff.

24 Q. And those are the same reasons that you
25 purchased the fixed-magazine weapons?

1 A. Correct.

2 Q. Do you currently possess any
3 detachable-magazine firearms for which you only have a
4 large-capacity magazine?

5 A. No.

6 Q. I'm going to turn your attention to paragraph 8
7 of the declaration.

8 MR. MEYERHOFF: And I'm not going to be asking
9 about the individual firearms anymore. So I don't know
10 if you want to not mark the transcript as that at this
11 point.

12 Ray, do you have any objection to -- to not marking
13 or removing the provisional --

14 MR. DIGUISEPPE: Oh.

15 MR. MEYERHOFF: -- designation --

16 MR. DIGUISEPPE: Yeah. I think --

17 MR. MEYERHOFF: -- moving forward?

18 MR. DIGUISEPPE: I -- I think we can memor- --
19 memorialize the parties' understanding that we've left
20 the area of concern for purposes of potentially --
21 the -- the later potential agreement or stipulation or
22 protective order that may go into place as to the
23 questions about individual firearms.

24 So we'll move on from that, and -- and we'll be in
25 a different territory.

1 County of Los Angeles,)
2 State of California,)
3

4 I, Allison Wong, Certified Shorthand Reporter
5 licensed in the State of California, License No. 13963,
6 hereby certify that the deponent was by me first duly
7 sworn and the foregoing testimony was reported by me and
8 was thereafter transcribed with Computer-Aided
9 Transcription; that the foregoing is a full, complete,
10 and true record of said proceeding.

11 I further certify that I am not of counsel or
12 attorney for either or any of the parties in the
13 foregoing proceeding and caption named or in any way
14 interested in the outcome of the cause in said caption.
15 The dismantling, unsealing, or unbinding of the
16 transcript will render the reporter's certificates null
17 and void.

18 In witness whereof, I have hereunto set my hand
19 this day: 23rd of July.

20 Read and Signing was requested.

21 Reading and Signing was waived.

22 Reading and Signing was not requested.

23
24 
25 ALLISON WONG,
CSR No. 13963

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENT DIVISION**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
) **CASE NO.** 2:17-cv-00903-WBS-KJN
)
ROB BONTA, et al.,)
)
)
Defendants.)
_____)

**DEPOSITION OF
GENERAL D. ALLEN YOUNGMAN**

DATE: Tuesday, July 18, 2023

REPORTER: Allison Wong, CSR No. 13963

VIA REMOTE VIDEO TECHNOLOGY



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) Case No. 2:17-cv-00903-
) WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

DEPOSITION OF
GENERAL D. ALLEN YOUNGMAN
July 18, 2023
9:33 a.m.

via Zoom Videoconference

1 Deposition of GENERAL D. ALLEN YOUNGMAN, called
2 as a witness by the Defendants, before ALLISON WONG,
3 Certified Shorthand Reporter Number 13963, for the
4 State of California, with principal office in the
5 County of Los Angeles, commencing at 9:33 a.m.,
6 July 18, 2023, via Zoom videoconference.

7 * * *

8
9 APPEARANCES OF COUNSEL:

10
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22 300 South Spring Street
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24 Los Angeles, California 90013-1256
25 (213)269-6177
robert.meyerhoff@doj.ca.gov

1 Q. What did you advise them on?

2 A. Primarily small unit tactics and operations.
3 To a certain extent, I would -- just general military
4 operations in the area of responsibility, which was in
5 the Mekong Delta.

6 Q. Did you advise them on the types of weapons
7 they should be using?

8 A. No. That decision was far, far above my level.

9 Q. Do you recall what types of weapons the South
10 Vietnamese army forces you advised possessed?

11 A. Yes. Primarily M16s, M60s, M79s, and 1911
12 pistols.

13 Q. The M16s that the South Vietnamese forces you
14 advised possessed, do you recall the capacity of those
15 detachable magazines?

16 A. They were nearly all 20. Although, during my
17 tour, a number of 30-round magazines starting becoming
18 available. But generally speaking, they were 20-round
19 magazines.

20 Q. Do you know why 30-round magazines became
21 available?

22 A. Because it was obviously advantageous to
23 increase the number of rounds that could be fired in
24 a -- an engagement with enemy forces.

25 Q. Why is that advantageous?

1 particularly precise number at that time. Tens of
2 millions maybe would come as close as we can get.

3 Q. And is it fair to say that that estimate of
4 tens of millions of large-capacity magazines is not your
5 estimate?

6 A. Yes. I think that's a fair statement. I think
7 that's just common knowledge within the -- the larger
8 firearms community.

9 Q. And to be clear, you've reviewed no documents
10 that contain the conclusion that tens of millions of
11 large-capacity magazines are owned by Americans;
12 correct?

13 A. That is correct.

14 Q. Do you recall a specific individual who told
15 you that they had formed an opinion that tens of
16 millions of Americans owned large-capacity magazines?

17 A. No. I don't recall.

18 Q. In paragraph 9, you say that "These,
19 quote/unquote, 'large-capacity magazines' are commonly
20 owned by millions of persons in the United States for a
21 variety of lawful purposes, including recreational
22 target shooting, competition, home defense, collecting,
23 and hunting."

24 Do you see that?

25 A. Correct. Yes. I do.

1 A. No. It would depend on their level of
2 training.

3 Q. To the best --

4 A. I'd --

5 Q. -- of your knowledge, what is the maximum
6 number of rounds that you believe someone with any
7 amount of training could discharge within one minute,
8 using that weapon and that magazine capacity?

9 MR. LEE: Objection. Calls for speculation. Lacks
10 foundation.

11 THE WITNESS: I -- I'd have to do -- I'd have to do
12 the math on it. I think usually we talk -- think about
13 semiautomatic fire, a sustained rate of, I think, 40 to
14 60 rounds a minute, I think. I think -- or maybe it's
15 40 to 50 or -- round per second or a little bit over
16 that, I believe, is the sustained rate for semiautomatic
17 fire. So it's, you know --

18 BY MR. MEYERHOFF:

19 Q. When you say --

20 A. -- whatever -- whatever the -- the math --

21 Q. Oh, I'm sorry. I interrupted you.

22 What were you going to say?

23 A. It's whatever the math would work out to be on
24 the 200-round drum magazine, assuming a -- a -- a rate
25 of 40 to 50 rounds a minute of a sustained rate,

1 sustained fire.

2 Q. Does the sustained rate include the amount of
3 time it takes to reload?

4 A. No. That's just -- that's a function of the
5 firearm itself.

6 Q. Taking the AR-15 as an example, along with the
7 30-round magazine, what is the maximum number of
8 magazines the average person could carry?

9 A. An AR-15, how many magazines could you carry?

10 Q. Yes.

11 MR. LEE: Objection. Lacks foundation. Calls for
12 speculation.

13 BY MR. MEYERHOFF:

14 Q. Yes. That's correct.

15 A. You're talking about putting them in a -- in a
16 backpack or a rucksack? I would probably say 30 or 40.
17 Talking about in pouches? Probably 18, somewhere in
18 that vicinity.

19 Q. When you say "pouches," what do you mean?

20 A. First example, in Vietnam, I -- I carried a
21 World War II vintage VAR magazine pouch that carried
22 eighteen 20-round magazines. That was -- I carried it
23 in the field. Each pouch -- it -- it was six different
24 pouches. Each one carried three roun- -- three
25 magazines.

1 County of Los Angeles,)
2 State of California,)

3
4 I, Allison Wong, Certified Shorthand Reporter
5 licensed in the State of California, License No. 13963,
6 hereby certify that the deponent was by me first duly
7 sworn and the foregoing testimony was reported by me and
8 was thereafter transcribed with Computer-Aided
9 Transcription; that the foregoing is a full, complete,
10 and true record of said proceeding.

11 I further certify that I am not of counsel or
12 attorney for either or any of the parties in the
13 foregoing proceeding and caption named or in any way
14 interested in the outcome of the cause in said caption.
15 The dismantling, unsealing, or unbinding of the
16 transcript will render the reporter's certificates null
17 and void.

18 In witness whereof, I have hereunto set my hand
19 this day: 25th of July.

20 Read and Signing was requested.

21 Reading and signing was waived.

22 Reading and signing was not requested.

23
24 
ALLISON WONG,
25 CSR No. 13963

Exhibit G

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
WILLIAM M. WIESE**

DATE: Thursday, July 20, 2023

REPORTER: Allison Wong, CSR No. 13963

VIA REMOTE VIDEO TECHNOLOGY



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) Case No. 2:17-cv-00903-
) WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

DEPOSITION OF
WILLIAM M. WIESE
July 20, 2023
2:42 p.m.

via Zoom Videoconference

1 Deposition of WILLIAM M. WIESE, called as a
2 witness by the Defendants, before ALLISON WONG,
3 Certified Shorthand Reporter Number 13963, for the
4 State of California, with principal office in the
5 County of Los Angeles, commencing at 2:42 p.m.,
6 July 20, 2023, via Zoom videoconference.

7 * * *

8
9 APPEARANCES OF COUNSEL:

10
11 FOR THE PLAINTIFFS:

12 SEILER EPSTEIN LLP
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14 4 Embarcadero Center
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16 San Francisco, California 94111-4164
17 (415)979-0500
18 gml@seilerepstein.com

19 FOR THE DEFENDANTS:

20 CALIFORNIA DEPARTMENT OF JUSTICE
21 BY: JERRY YEN, ESQ.
22 300 South Spring Street
23 Suite 1702
24 Los Angeles, California 90013-1256
25 (213)269-6177
 jerry.yen@doj.ca.gov

 ALSO PRESENT:

 Jenni Rosenberg

1 situation, especially with multiple attackers, which is
2 not uncommon.

3 Q. Why do you say it's not uncommon?

4 A. You can read the newspapers where there are
5 home invasions with multiple perpetrators.

6 Q. So your testimony is that your ability to
7 defend yourself with a firearm holding a magazine with
8 ten rounds or less is less effective if -- in situations
9 where there are more than one attacker?

10 A. Yes.

11 Q. Have you ever actually had to use LCMS in
12 self-defense?

13 MR. LEE: Object to the form of the question. The
14 term "use" is vague and ambiguous.

15 You may answer the question.

16 THE WITNESS: I have never had to use a firearm of
17 any style or capacity in self-defense.

18 BY MR. YEN:

19 Q. Has anyone in your household ever discharged a
20 firearm in self-defense?

21 A. No.

22 Q. Have you ever been the victim of a crime?

23 A. Vandalism of vehicle.

24 Q. Any other crimes that you've been a victim of?

25 A. No.

1 County of Los Angeles,)
2 State of California,)
3

4 I, Allison Wong, Certified Shorthand Reporter
5 licensed in the State of California, License No. 13963,
6 hereby certify that the deponent was by me first duly
7 sworn and the foregoing testimony was reported by me and
8 was thereafter transcribed with Computer-Aided
9 Transcription; that the foregoing is a full, complete,
10 and true record of said proceeding.

11 I further certify that I am not of counsel or
12 attorney for either or any of the parties in the
13 foregoing proceeding and caption named or in any way
14 interested in the outcome of the cause in said caption.
15 The dismantling, unsealing, or unbinding of the
16 transcript will render the reporter's certificates null
17 and void.

18 In witness whereof, I have hereunto set my hand
19 this day: 2nd of August.

20 Read and Signing was requested.

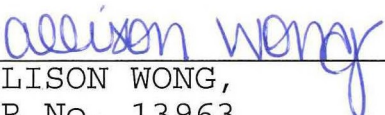
21 Reading and Signing was waived.

22 Reading and Signing was not requested.

23

24

25



ALLISON WONG,
CSR No. 13963

Exhibit H

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
JAMES CURCURUTO**

DATE: Thursday, August 3, 2023

REPORTER: Althea L Miller, CSR No. 33553/RPR/CCRR

VIA REMOTE VIDEO TECHNOLOGY



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

WILLIAM WIESE, et al.,)
)
 Plaintiffs,)
)
v.) No. 2:17-cv-00903-WBS-KJN
)
ROB BONTA, et al.,)
)
 Defendants.)
_____)

DEPOSITION OF: JAMES CURCURUTO

TAKEN ON: August 3, 2023

APPEARING REMOTELY FROM MIDDLEBURY, CONNECTICUT

STENOGRAPHICALLY REPORTED BY:

ALTHEA L. MILLER

CSR No. 3353, RPR, CCRR No. 149

File No. 107482

APPEARING REMOTELY FROM LOS ANGELES COUNTY,
CALIFORNIA

1 REMOTE DEPOSITION OF JAMES CURCURUTO,
2 taken on behalf of the Defendants, with
3 all parties, by agreement, attending the
4 deposition remotely in Los Angeles
5 and San Francisco counties, California, on
6 Thursday, August 3, 2023, at 9:33 A.M., before
7 Althea L. Miller, CSR No. 3353, RPR,
8 CCRR No. 149.

9
10 APPEARANCES:

11 For the Plaintiffs:

12 SEILER EPSTEIN LLP
13 BY: GEORGE M. LEE, ESQ.
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18 gml@seilerepstein.com

19 For the Defendants:

20 OFFICE OF THE ATTORNEY GENERAL
21 OF THE STATE OF CALIFORNIA
22 BY: ROBERT L. MEYERHOFF,
23 Deputy Attorney General
24 JOHN D. ECHEVERRIA,
25 Deputy Attorney General
300 South Spring Street
Suite 1702
Los Angeles, California 90013-1230
(213) 269-6177
Robert.Meyerhoff@doj.ca.gov
John.Echeverria@doj.ca.gov

///

1 Q And these are executives of firearms
2 companies?

3 A Correct.

4 The attendees of Shot Show were primarily
5 firearm manufacturers, ammunition manufacturers, and
6 any businesses that had to do with that market.
7 Retailers, ranges, parts manufacturers.

8 Q Who did you report to in your role as
9 director of research and market development?

10 A At the time I believe it was still
11 Randy Clark and I'm not sure of the time.

12 He had left the organization and then I had
13 reported to Chris Dolmack, and I'm not sure how --
14 how long I had reported to Randy in my new role and
15 then transferred over reporting to somebody else.

16 Q Is it fair to say that the whole time you
17 were at NSSF, you were within the business
18 development division?

19 A Correct.

20 Q When was your last day of employment at
21 NSSF?

22 A Early January 2021. I don't recall the
23 specific date.

24 Q Why did you leave NSSF?

25 A They had staff reductions due to losing --

1 those should be unrestricted?

2 A I do not have a strong opinion on that.

3 Q Do you have a strong opinion on whether --
4 I'll just rephrase.

5 Do you have any opinion on whether
6 magazines capable of holding more than 100 rounds
7 should be restricted?

8 A Again, I haven't really had any experience
9 with that, no personal or professional experience
10 firing or using that product or much knowledge of
11 that at all; so I don't have much of an opinion on
12 magazines holding more than 100 rounds.

13 Q Do you have any opinion on them?

14 A I -- I -- from the limited experience I
15 have with them, I -- I don't really -- I don't
16 really have an opinion at this time on those.

17 Q In your opinion, would it be fair to
18 describe magazines as a firearm accessory?

19 A Yes.

20 Q Are you familiar with what are called
21 silencers?

22 A Suppressor, silencer, I believe that just
23 gets connected to the top of the barrel for noise
24 abatement. If so -- if that's your definition of
25 what you're talking about, yes, I do have knowledge

1 "... the Chart further shows
2 magazines capable of holding more
3 than 10 rounds of ammunition
4 accounted for approximately
5 115 million or approximately half of
6 all magazines owned"?

7 Do you see that?

8 A I do.

9 Q And then in paragraph 9, you mention the
10 sources of information you used to reach that
11 conclusion; correct?

12 (The record was read.)

13 THE WITNESS: Yes. That is correct.

14 BY MR. MEYERHOFF:

15 Q And the three sources of information you
16 used for this data are, 1, the ATF's AFMER report;
17 2, documents from the International Trade
18 Commission; and, 3, the opinions of firearm industry
19 professionals. Correct?

20 A Not documents from the ITC, but they had
21 a -- a data web that was -- so you could query the
22 system; so they weren't documents. They were a
23 query system.

24 Q Okay. So the three sources of information
25 you relied on were the ATF AFMER report, information

1 from the U.S. ITC, and opinions of firearm industry
2 professionals; correct?

3 A Correct.

4 Q And in paragraph 10, you state:

5 "The ATF AFMER" report "data
6 provide historical figures for
7 pistols by caliber (i.e., the
8 specific ammunition cartridge for
9 which a firearm is chambered) and
10 rifles produced in the United States
11 for consumer purchase."

12 Do you see that?

13 A Yes.

14 Q So is it fair to say that AFMER data
15 includes the number of firearms by category that are
16 manufactured in a given year?

17 A They do provide different categories.

18 U.S. manufacturers are required to report
19 their production to the ATF, and I believe the
20 categories are pistols, revolvers, shotguns, rifles,
21 miscellaneous. I think those are the primary
22 categories within the AFMER reports.

23 Q And the AFMER report deals specifically
24 with manufacture; correct?

25 A U.S. manufacture; correct.

1 Q And so it doesn't tell you how many
2 firearms were actually purchased in a given year;
3 correct?

4 A Correct.

5 Q And it doesn't tell you how many firearms
6 were actually purchased by private individuals, does
7 it?

8 A It does not.

9 Q So firearms that are manufactured in a
10 given year and cataloged in AFMER could come into
11 the possession of law enforcement agencies; correct?

12 A I believe the AFMER report does not
13 include, like, military, but it would include some
14 law enforcement, but I'm a little -- I don't recall
15 if there was a threshold now, if they included all
16 firearms that could be purchased by law
17 enforcement -- certainly by an individual law
18 enforcement person -- but I'm not sure if it
19 included firearms produced for law enforcement
20 offices.

21 Q So is it fair to say that firearms
22 manufactured in a given year and cataloged in AFMER
23 could come into the possession of some law
24 enforcement agencies; correct?

25 A I believe so, yes.

1 Q And firearms that are manufactured in a
2 given year and cataloged in AFMER could come into
3 the possession of private security organizations;
4 correct?

5 A Yes.

6 Q And firearms that are manufactured in a
7 given year and cataloged in AFMER could come into
8 the possession of firearms wholesalers; correct?

9 A Correct.

10 Q And firearms that are manufactured in a
11 given year and cataloged into AFMER could come into
12 the possession of firearms retailers; correct?

13 A Correct.

14 Q AFMER data does not track how many firearms
15 are -- are illegally trafficked from the
16 United States into other countries, does it?

17 A I'm sorry. Can you repeat that one? I
18 want to make sure --

19 Q AFMER data does not track how many
20 firearms, if any, are illegally trafficked from the
21 United States to another country; correct?

22 A Correct.

23 Q AFMER data does not track numbers of
24 magazines at all; correct?

25 A Correct.

1 Q The ITC data that you relied on -- it
2 doesn't tell you how many firearms were actually
3 purchased by private citizens in a given year;
4 correct?

5 A Correct.

6 Q And it doesn't tell you how many firearms,
7 if any, were imported in a given year, cataloged by
8 ITC and then came into the possession of some law
9 enforcement agencies; correct?

10 A Correct.

11 Q And firearms that are imported in a given
12 year and cataloged by ITC could come into the
13 possession of private security organizations;
14 correct?

15 A Correct.

16 Q Firearms that were imported in a given year
17 and cataloged by the ITC could come into the
18 possession of firearm wholesalers; correct?

19 A Correct.

20 Q Firearms that are imported in a given year
21 and cataloged by ITC could come into the possession
22 of firearms retailers; correct?

23 A Correct.

24 Q And the ITC does not track how many
25 firearms, if any, are illegally trafficked from the

1 United States into another country; correct?

2 A To the best of my knowledge, they do not.

3 Q Does AFMER data track firearm attrition
4 rates, meaning the rate of firearms that cease to be
5 functional due to loss, destruction, or
6 deterioration?

7 A It does not.

8 Q Does ITC data track that?

9 A It does not.

10 Q And ITC doesn't track magazines, does it?

11 A I don't believe so. They have hundreds and
12 hundreds of codes and, you know, for the purpose of
13 this one, we were just looking at the firearms
14 imported minus exported, and, you know, I don't
15 recall that they -- the ITC tracks magazines or, at
16 least at the time, we didn't identify a code that
17 did.

18 Q Are you aware of anyone in the firearms
19 industry who tracks how many people actually own
20 LCMs?

21 A Just to confirm, LCM, large capacity
22 magazine, referring to 11-plus?

23 No. I'm not aware of anybody. That
24 doesn't mean that somebody doesn't.

25 Q So in paragraph 11, you state:

1 I, ALTHEA L. MILLER, CSR NO. 3353, RPR,
2 CCRR NO. 149 certify: That the foregoing proceedings
3 were taken before me at the time and place herein set
4 forth; at which time the witness, JAMES CURCURUTO, was
5 duly sworn; and that the transcript is a true record of
6 the testimony so given.

7 Witness review, correction, and signature
8 was

9 () by Code. () requested.
10 () waived. (X) not requested.

11
12 The dismantling, unsealing, or unbinding of
13 the original transcript will render the Reporter's
14 Certificate null and void.

15 I further certify that I am not financially
16 interested in the action, and I am not a relative or
17 employee of any attorney of the parties, nor of any
18 of the parties.

19
20 Dated this 13th day of August, 2023.

21
22
23 
24 ALTHEA L. MILLER, CSR No. 3353, RPR, CCRR No. 149

25 ///

Exhibit I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WILLIAM WIESE, et al.,)
)
Plaintiffs,)
)
vs.) **CASE NO.**
) 2:17-cv-00903-WBS-KJN
ROB BONTA, et al.,)
)
Defendants.)
_____)

**DEPOSITION OF
LUONG Q. DANG
VOLUME 1**

DATE: Thursday, July 27, 2023

REPORTER: Susan Van Booven, CSR No. 3956

VIA REMOTE VIDEO TECHNOLOGY



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1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA
3 SACRAMENTO DIVISION
4

5 WILLIAM WIESE, et al.,)
6 Plaintiffs,)
7 vs.) Case No. 2:17-cv-
8 ROB BONTA, et al.,) 00903-WBS-KJN
9 Defendants.)
10 _____)
11
12
13
14
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16
17
18

19 DEPOSITION OF LUONG Q. DANG, VOLUME 1, taken
20 on behalf of the Defendants Rob Bonta and Allison
21 Mendoza, at (PARTICIPANTS REMOTE), California,
22 beginning at 12:35 p.m. and ending at 2:12 p.m., on
23 Thursday, July 27, 2023, before Susan Van Booven,
24 Certified Shorthand Reporter No. 3956.
25

1 APPEARANCES:

2

3 For the Plaintiffs:

4 THE DiGUISEPPE LAW FIRM, P.C.
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14

15 Also Present (Remotely):

16

17 MacKENNA ALVAREZ

17

18

19

20

21

22

23

24

25

1 A I don't quite understand your question.

2 Q So the large-capacity magazines you own, you
3 state, were originally manufactured for a Steyr GB
4 pistol, correct?

5 A Yes.

6 Q Do you know -- let me rephrase.
7 You state that -- you testified earlier that
8 this pistol was manufactured in Austria, correct?

9 A Yes.

10 Q Do you know if it was first sold in Austria?

11 A No.

12 Q Do you know how it was imported into the
13 United States?

14 A No.

15 Q You state in paragraph 5, "As far as I am
16 aware, the magazines that I have for the Steyr GB
17 pistol were the only magazines made for that pistol."
18 Do you see that?

19 A Yes.

20 Q Why do you say "as far as I am aware"?

21 A After 2000, through searches and conversations
22 with dealers and manufacturers, I've come so far to the
23 conclusion that there are no aftermarket manufacturers
24 out there for it.

25 Q But that's only as far as you're aware,

1 correct?

2 A Yes.

3 Q The next sentence starts, "On information and
4 belief." Do you see that?

5 A Yes.

6 Q What does that sentence mean to you? I mean,
7 what does that phrase, "On information and belief,"
8 mean to you?

9 A What I understand, what I know.

10 Q Have you contacted the original manufacturer
11 of this pistol?

12 A No.

13 Q So, to be clear, you've never inquired of them
14 whether there were other magazines made for this
15 pistol, correct?

16 A I've researched through their website.

17 Q But you've never contacted them, correct?

18 A No. No.

19 Q What is the current condition of your Steyr GB
20 pistol?

21 A I don't understand your question.

22 Q Would you describe the condition of your Steyr
23 pistol as new, like new, average?

24 A Like new.

25 Q Have you ever fired your Steyr GB pistol?

1 DEPOSITION OFFICER'S CERTIFICATE

2 (Civ. Proc. S 2025.520 (e))

3 STATE OF CALIFORNIA)
4 COUNTY OF LOS ANGELES) ss.

5
6 I, Susan Van Booven, hereby certify:

7 I am a duly qualified Certified Shorthand
8 Reporter, in the State of California, holder of
9 Certificate No. 3956 issued by the Court Reporters
10 Board of California and which is in full force and
11 effect. (Bus. & Prof. S 8016)

12 I am not financially interested in this
13 action and am not a relative or employee of any
14 attorney of the parties, or of any of the parties.
15 (Civ. Proc. S 2025.320(a))

16 I am authorized to administer oaths or
17 affirmations pursuant to California Code of Civil
18 Procedure Section 2093(b), and prior to being
19 examined, the deponent was first placed under oath
20 or affirmation by me. (Civ. Proc. S 2025.320,
21 2025.540(a))

22 I am the deposition officer that
23 stenographically recorded the testimony in the
24 foregoing deposition, and the foregoing transcript
25 is a true record of the testimony given. (Civ.

1 Proc. S 2025.540(a))

2 I have not, and shall not, offer or provide
3 any services or products to any party's attorney or
4 third party who is financing all or part of the
5 action without first offering same to all parties or
6 their attorneys attending the deposition and making
7 same available at the same time to all parties or
8 their attorneys. (Civ. Proc. S 2025.320(b))

9 I shall not provide any service or product
10 consisting of the deposition officer's notations or
11 comments regarding the demeanor of any witness,
12 attorney, or party present at the deposition to any
13 party or any party's attorney or third party who is
14 financing all or part of the action, nor shall I
15 collect any personal identifying information about
16 the witness as a service or product to be provided
17 to any party or third party who is financing all or
18 part of the action.

19

20

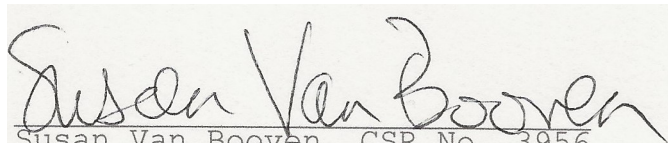
21 Dated: August 11, 2023

22

23

24

25



Susan Van Booven, CSR No. 3956