

1 C. D. Michel – SBN 144258
2 cmichel@michellawyers.com
3 Joshua R. Dale – SBN 209942
4 jdale@michellawyers.com
5 Konstadinos T. Moros – SBN 306610
6 kmoros@michellawyers.com
7 Alexander A. Frank – SBN 311718
8 afrank@michellawyers.com
9 MICHEL & ASSOCIATES, P.C.
10 180 E. Ocean Blvd., Suite 200
11 Long Beach, CA 90802
12 Telephone: (562) 216-4444

13 Donald Kilmer-SBN 179986
14 Law Offices of Donald Kilmer, APC
15 14085 Silver Ridge Road
16 Caldwell, Idaho 83607
17 Telephone: (408) 264-8489
18 Email: Don@DKLawOffice.com

19 Attorneys for Plaintiffs

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**
22 **SOUTHERN DIVISION**

23 RENO MAY, an individual; ANTHONY
24 MIRANDA, an individual; ERIC HANS,
25 an individual; GARY BRENNAN, an
26 individual; OSCAR A. BARRETTO, JR.,
27 an individual; ISABELLE R.
28 BARRETTO, an individual; BARRY
BAHRAMI, an individual; PETE
STEPHENSON, an individual; ANDREW
HARMS, an individual; JOSE FLORES,
an individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.; THE
LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

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

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**EVIDENTIARY OBJECTIONS OF
PLAINTIFFS TO DECLARATION
OF DR. JEANNE KISACKY FILED
IN SUPPORT OF DEFENDANT'S
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: December 20, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J.
Carney

1 **TO THIS HONORABLE COURT:**

2 Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary Brennan, Oscar A.
3 Barretto, Jr., Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Andrew Harms,
4 Jose Flores, Dr. Sheldon Hough, DDS, The Second Amendment Foundation, Gun
5 Owners of America, Inc., Gun Owners of California, Inc., The Liberal Gun Club,
6 Inc., and California Rifle & Pistol Association, Incorporated, hereby jointly object,
7 pursuant to Fed. R. Evid. 401, 402, 403, 601, 702, 703, and 704, to the Declaration
8 of Dr. Jeanne Kisacky lodged by Defendant in support of his Brief in Opposition to
9 Plaintiffs’ Motion for Preliminary Injunction. These objections are raised on the
10 following grounds and as to the following matters contained within the declaration:

11 **1. Objection to Paragraphs 6-32:**

12 Relevance. Facts and opinions as the historical operation of hospitals,
13 their layouts, and who utilized them, without any discussion or citation to firearms
14 laws or regulations applicable to such hospitals during the relevant analogical
15 period, are not relevant to the evidence of Founding through Reconstruction
16 historical analogues that governments must produce to show a history and tradition
17 of firearms regulation. *See New York State Rifle & Pistol Ass’n v. Bruen*, 597 U.S.
18 ___, 142 S. Ct. 2111, 2137, 2153-54 (2022).

19 For the reasons set forth above, the court should strike or disregard the
20 declaration in its entirety in ruling on Plaintiffs’ motion, or, in the alternative, strike
21 and disregard those identified opinions.

22 Dated: November 20, 2023 **MICHEL & ASSOCIATES, P.C.**
23 /s/ C.D. Michel
24 C.D. Michel
Counsel for Plaintiffs

25 Dated: November 20, 2023 **LAW OFFICES OF DON KILMER**
26 /s/ Don Kilmer
27 Don Kilmer
28 Counsel for Plaintiff The Second Amendment
Foundation

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 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:

EVIDENTIARY OBJECTIONS OF PLAINTIFFS TO DECLARATION OF DR. JEANNE KISACKY FILED IN SUPPORT OF DEFENDANT'S OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION

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
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

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

Executed November 20, 2023.


Christina Castron