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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 PROFESSOR SHARON
MURPHY FILED IN SUPPORT OF
DEFENDANT’S OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: December 4, 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 Professor Sharon Murphy, lodged by Defendant in support of his Brief in
9 Opposition to Plaintiffs’ Motion for Preliminary Injunction. These objections are
10 raised on the following grounds and as to the following matters contained within
11 the declaration:

12 **1. Objection to Paragraphs 8-20:**

13 Relevance. The alleged lack of ubiquity of banks during the pre-Founding
14 Colonial era, during the Founding, and in the period up through Reconstruction,
15 when compared with the ubiquity of banks today, where there is no discussion of
16 firearms regulation during such period, is not relevant to the evidence of a history
17 and tradition of Founding through Reconstruction historical analogues that
18 governments must produce to show a tradition of firearm regulation regarding
19 banks. *See New York State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. ___, 142 S. Ct.
20 2111, 2133, 2146-47 (2022).

21 **2. Objection to Paragraphs 21-24:**

22 Relevance. The alleged lack of ubiquity of bank and stagecoach robberies
23 during the relevant analogical period, where there is no discussion of firearms
24 regulation regarding banks during such period, is not relevant as evidence of a
25 history and tradition of Founding through Reconstruction historical analogues that
26 governments must produce to show a tradition of firearm regulation regarding
27 banks.

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1 **3. Objection to Paragraphs 24-25:**

2 Relevance. The alleged lack of ubiquity of bank robberies during the post-
3 Reconstruction era and Twentieth century is manifestly not relevant as evidence of
4 a history and tradition of Founding through Reconstruction historical analogues that
5 governments must produce to show a tradition of firearm regulation regarding
6 banks.

7 **4. Objection to Paragraph 26:**

8 Relevance. The purported need for stability in the modern financial
9 system is not relevant to whether there is a history or tradition of regulating the
10 possession of firearms for self-defense in banks and other financial institutions.
11 The cited study on gun violence in communities is also not relevant as to whether
12 there is a history or tradition of regulating the possession of firearms for self-
13 defense in banks and other financial institutions.

14
15 Dated: November 20, 2023

MICHEL & ASSOCIATES, P.C.

/s/ C.D. Michel

C.D. Michel
Counsel for Plaintiffs

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19 Dated: November 20, 2023

LAW OFFICES OF DON KILMER

/s/ Don Kilmer

Don Kilmer
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
PROFESSOR SHARON MURPHY 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