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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED; THE
15 SECOND AMENDMENT FOUNDATION;
GUN OWNERS OF AMERICA, INC.;
16 GUN OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
17 ERICK VELASQUEZ, an individual;
CHARLES MESSEL, an individual;
18 BRIAN WEIMER, an individual;
CLARENCE RIGALI, an individual;
19 KEITH REEVES, an individual, CYNTHIA
GABALDON, an individual; and
20 STEPHEN HOOVER, an individual,

21 Plaintiffs,

22 v.

23 LOS ANGELES COUNTY SHERIFF’S
DEPARTMENT; SHERIFF ROBERT
LUNA, in his official capacity; LA VERNE
24 POLICE DEPARTMENT; LA VERNE
CHIEF OF POLICE COLLEEN FLORES,
25 in her official capacity; ROBERT BONTA,
in his official capacity as Attorney General
26 of the State of California; and DOES 1-10,

27 Defendants.
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Case No.: 8:23-cv-10169-SPG
(ADSx)

**PLAINTIFFS’ NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: March 13, 2024
Hearing Time: 1:30 p.m.
Courtroom: 5C
Judge: Hon. Sherilyn Peace Garnett

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is hereby given that on March 13, 2024, at 1:30 p.m. in Courtroom 5C
3 of the above-captioned court, located at 350 West 1st Street in Los Angeles,
4 California, Plaintiffs California Rifle & Pistol Association, Incorporated, The
5 Second Amendment Foundation, Gun Owners of America, Inc., Gun Owners
6 Foundation, Gun Owners of California, Inc., Erick Velasquez, Charles Messel,
7 Brian Weimer, Clarence Rigali, Keith Reeves, Cynthia Gabaldon, and Stephen
8 Hoover (collectively, “Plaintiffs”) will move for a preliminary injunction under
9 Rule 65(a) of the Federal Rules of Civil Procedure.

10 Specifically, Plaintiffs will seek an order temporarily enjoining Defendants
11 and their employees, agents, successors in office from continuing to engage in
12 concealed handgun license (“CCW permit”) issuance policies that result in lengthy
13 wait times, exorbitant fees, and discretionary issuance criteria. Additionally,
14 Plaintiffs seek to require California to honor CCW permits issued in other states
15 and the District of Columbia. Plaintiffs contend that long wait times, high fees,
16 discretionary criteria, and not recognizing the CCW permits of other states each
17 violate the constitution.

18 This application is made on the grounds set forth in the accompanying
19 memorandum of points and authorities, Plaintiffs’ Request for Judicial Notice, the
20 signed declarations of each of the plaintiffs; other supporting declarations, all
21 pleadings and papers filed in this action, the argument of counsel, and further
22 evidence as the Court may consider before ruling on the preliminary injunction
23 requested herein.

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1 Respectfully Submitted,

2 Dated: January 26, 2024

MICHEL & ASSOCIATES, P.C.

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/s/ C.D. Michel

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C.D. Michel
Counsel for Plaintiffs

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6 Dated: January 26, 2024

LAW OFFICES OF DON KILMER

7

/s/ Don Kilmer

8

Don Kilmer
Counsel for Plaintiff The Second Amendment
Foundation

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ATTESTATION OF E-FILED SIGNATURES

12

I, C.D. Michel, am the ECF User whose ID and password are being used to
13 file this PLAINTIFFS’ NOTICE OF MOTION AND MOTION FOR
14 PRELIMINARY INJUNCTION. In compliance with Central District of California
15 L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have
16 concurred in this filing.

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Dated: January 26, 2024

/s/ C.D. Michel

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C.D. Michel

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

Case Name: *California Rifle and Pistol Association, et al., v. Los Angeles County Sheriff's Dept., et al.*

Case No.: 8:23-cv-10169-SPG (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:

PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION

on the following parties, as follows:

Mark R Beckington
Jane E. Reilley
Christina R.B. Lopez, Deputy Attorney General
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Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
jane.reilley@doj.ca.gov
Christina.Lopez@doj.ca.gov
Attorney for Defendants

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

Additionally, the following parties were served by transmitting a true copy via electronic mail as follows:

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Attorneys for Defendants La Verne Police Department and La Verne Chief of Police Colleen Flores

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

Executed January 26, 2024


Christina Castron