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Robert Luna

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8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

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

26 Plaintiff,

27 v.

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

Defendants.

Case No. 2:23-cv-10169-SPG-ADS

**DECLARATION OF RYAN
CHABOT IN SUPPORT OF
DEFENDANTS LOS ANGELES
COUNTY SHERIFF'S
DEPARTMENT AND SHERIFF
ROBERT LUNA'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Sherilyn Peace
Garnett

Hearing Date: March 13, 2024

Hearing Time: 1:30 p.m.

Courtroom: 5C

DECLARATION OF RYAN CHABOT

Cal. Rifle & Pistol Ass'n v. Los Angeles County Sheriff's Dep't, No. 2:23-cv-10169

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11 *Sheriff's Department and Sheriff Robert Luna*

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1 I, Ryan Chabot, declare:

2 1. I am an attorney with the law firm of Wilmer Cutler Pickering Hale
3 and Dorr LLP, counsel for the Los Angeles Sheriff's Department and Sheriff
4 Robert Luna. I am licensed to practice law in the States of New York and New
5 Jersey and will be seeking permission to participate in this litigation *pro hac vice*
6 on behalf the Los Angeles Sheriff's Department and Sheriff Robert Luna. I have
7 personal knowledge of the facts set forth herein and with the proceedings in this
8 case, and if called to testify as a witness thereto, I would do so competently under
9 oath.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of a Request
11 for a Domestic Violence Restraining Order against Sherwin David Partowashraf,
12 with the name of the victim redacted.

13 3. Attached hereto as Exhibit 2 is a true and correct copy of the
14 Temporary Restraining Order restraining Sherwin David Partowashraf, with the
15 name of the victim redacted.

16 4. Attached hereto as Exhibit 3 is a true and correct copy of the Superior
17 Court of California's July 18, 2022 minutes of proceedings in case number
18 22STRO03813, with the name of the victim redacted.

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

21
22 Executed on February 21, 2024.

23
24 /s/ Ryan Chabot

25 Ryan Chabot
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ATTESTATION OF E-FILED SIGNATURES

I, Mark Selwyn, am the ECF user whose ID and password are being used to file this Declaration Of Ryan Chabot In Support Of Defendants Los Angeles County Sheriff’s Department And Sheriff Robert Luna’s Opposition To Plaintiffs’ Motion For Preliminary Injunction. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: February 21, 2024

/s/ Mark Selwyn
Mark Selwyn