

1 MARK SELWYN (CA Bar No. 244180)
mark.selwyn@wilmerhale.com
2 WILMER CUTLER PICKERING
HALE AND DORR LLP
3 2600 El Camino Road
Palo Alto, California 94306
4 Telephone: (650) 858-6031
Facsimile: (650) 858-6100

5 *Attorneys for Defendants Los Angeles County*
6 *Sheriff's Department and Sheriff Robert Luna*

7 *(additional counsel listed below)*

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

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

18 Plaintiffs,

19 v.

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

25 Defendants.
26

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

**DEFENDANTS LOS ANGELES
COUNTY SHERIFF'S
DEPARTMENT AND SHERIFF
ROBERT LUNA'S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT
OF 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

1 ALAN SCHOENFELD (*pro hac vice* forthcoming)
alan.schoenfeld@wilmerhale.com
2 NOAH LEVINE (*pro hac vice* forthcoming)
3 noah.levine@wilmerhale.com
4 RYAN CHABOT (*pro hac vice* forthcoming)
ryan.chabot@wilmerhale.com
5 WILMER CUTLER PICKERING
6 HALE AND DORR LLP
7 7 World Trade Center
8 250 Greenwich Street
9 New York, NY 10007
Telephone: (212) 937-7294
Facsimile: (212) 230-8888

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11 *Attorneys for Defendants Los Angeles County*
Sheriff's Department and Sheriff Robert Luna
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1 **DEFENDANTS’ REQUEST FOR JUDICIAL NOTICE**

2 Pursuant to Federal Rule of Evidence 201, Defendants Los Angeles County
3 Sheriff’s Department and Sheriff Robert Luna respectfully request that this Court take
4 judicial notice of the following documents in support of their opposition to Plaintiffs’
5 motion for preliminary injunction. The attached are copies of the laws detailed in
6 Defendants’ Survey of Historical License Requirements, which is included at the next
7 page.

8 The Court may take judicial notice of any fact that is “not subject to reasonable
9 dispute in that it is either (1) generally known within the territorial jurisdiction of the trial
10 court or (2) capable of accurate and ready determination by resort to sources whose
11 accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b). A court shall take
12 judicial notice if requested by a party and supplied with the necessary information. Fed.
13 R. Evid. 201(d).

14 “A trial court may presume that public records are authentic and trustworthy.”
15 *Gilbrook v. City of Westminster*, 177 F.3d 839, 858 (9th Cir. 1999). The accuracy of
16 these public records consisting of enacted legislation cannot reasonably be questioned,
17 and judicial notice of these records is therefore appropriate. Fed. R. Evid. 201(b).

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19 Dated: February 21, 2024

WILMER CUTLER PICKERING
HALE AND DORR LLP

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22 By: /s/ Mark Selwyn
23 Mark Selwyn

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25 MARK SELWYN (CA Bar No. 244180)
26 mark.selwyn@wilmerhale.com
27 WILMER CUTLER PICKERING
28 HALE AND DORR LLP

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2600 El Camino Road
Palo Alto, California 94306
Telephone: (650) 858-6031
Facsimile: (650) 858-6100

ALAN SCHOENFELD (*pro hac vice*
forthcoming)
alan.schoenfeld@wilmerhale.com
NOAH LEVINE (*pro hac vice* forthcoming)
noah.levine@wilmerhale.com
RYAN CHABOT (*pro hac vice*
forthcoming)
ryan.chabot@wilmerhale.com
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HALE AND DORR LLP
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Telephone: (212) 937-7294
Facsimile: (212) 230-8888