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STATE OF CALIFORNIA  
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11  
12 Deputy District Attorney MICHELE  
HANISEE, an individual,

13 Plaintiff,

14 v.

15 STATE OF CALIFORNIA; and DOES 1  
16 through 25, inclusive,

17 Defendants.

Case No. 23STCV07718

(Assigned for all Purposes to the  
Honorable Upinder S. Kalra)

**[PROPOSED] ORDER GRANTING  
MOTION TO STRIKE ALLEGATIONS  
FROM PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

**Reservation No. 631026040870**

Date: October 11, 2023

Time: 9:00 a.m.

Dept.: 51

Date Action Filed: April 7, 2023

Trial Date: None

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23 Defendant State of California's Motion to Strike Allegations from Plaintiff's First  
24 Amended Complaint in the above-captioned action has come before the Court. Having  
25 considered the motion, memorandum filed in support, any opposition filed in response, and any  
26 oral argument related to the same, the Court, being duly apprised of the premises and good cause  
27 appearing, now finds and rules:  
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1 IT IS HEREBY ORDERED that the following allegations are stricken from the First  
2 Amended Complaint:

- 3 1. Prayer for Relief item 2, “For exemplary damages against DOES where allowed under  
4 statute.” (Page 15, lines 17.)
- 5 2. Prayer for Relief item 3, “For preliminary and permanent injunctive relief to prevent  
6 the further dissemination or publication of Plaintiff’s home address, date of birth, or  
7 CII Number in the possession of Defendants by any of them, whether on the State’s  
8 firearms data web portal or any other publicly accessible database maintained by the  
9 State or any of its departments or subdivisions.” (Page 15, lines 18-22.)
- 10 3. Prayer for Relief item 4, “For a declaration by the Court under Code of Civil  
11 Procedure section 1060 as to the rights, responsibilities, and obligations of Plaintiff  
12 and Defendants to one another, and each of them, including, specifically, as to the  
13 obligation of Defendants of the further steps they must take to safeguard and refrain  
14 from publicly disclosing information obtained or kept by Defendants as a result of  
15 Plaintiff’s application for or holding of a CCW permit, including specifically, the  
16 home address, date of birth, and CII information contained therein, and for any other  
17 declarations and orders necessary to effect a remedy sought or available under the  
18 causes of action pled hereinabove.” (Page 15, line 23 – page 16, line 2.)

19 **IT IS SO ORDERED.**

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21 Dated: \_\_\_\_\_, 2023

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24 The Honorable Upinder S. Kalra  
25 Judge of the Superior Court  
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**PROOF OF SERVICE**

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 707 Wilshire Boulevard, Suite 6000, Los Angeles, California 90017-3543. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on July 18, 2023, I served a copy of:

**[PROPOSED] ORDER GRANTING MOTION TO STRIKE ALLEGATIONS FROM PLAINTIFF’S FIRST AMENDED COMPLAINT**

**BY ELECTRONIC SERVICE [Code Civ. Proc sec. 1010.6; CRC 2.251]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system from NCaruthersDodson@mof.com to the email address(es) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251.

**BY ELECTRONIC SERVICE [Code Civ. Proc sec. 1010.6; CRC 2.251]** by electronically mailing a true and correct copy through **FIRST LEGAL'S** electronic mail system to the email address(es) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6 and CRC Rule 2.251.

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*Attorneys for Plaintiff*  
MICHELE HANISEE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed at Los Angeles, California, this 18th day of July, 2023.

Nieka Caruthers-Dodson  
\_\_\_\_\_  
(typed)

*N. Caruthers-Dodson*  
\_\_\_\_\_  
(signature)