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8 of Justice and Former Attorney General Xavier
Becerra in his personal capacity only*
9

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES
13

14 **FRANKLIN ARMORY, INC. AND
CALIFORNIA RIFLE & PISTOL
15 ASSOCIATION, INCORPORATED,**

16
17 Plaintiffs,

18 v.

19 **CALIFORNIA DEPARTMENT OF
JUSTICE, XAVIER BECERRA, IN HIS
20 OFFICIAL CAPACITY AS ATTORNEY
GENERAL FOR THE STATE OF
21 CALIFORNIA, AND DOES 1-10,**

22 Defendants.
23

Case No. 20STCP01747

**DECLARATION OF KENNETH G.
LAKE IN OPPOSITION TO
PLAINTIFF'S MOTION TO STRIKE
COSTS OR, ALTERNATIVELY, STAY
ENFORCEMENT OF JUDGMENT
PENDING APPEAL**

Date: September 25, 2024

Time: 8:30 a.m.

Dept.: 32

Honorable Daniel S. Murphy

24 I, Kenneth G. Lake, declare:

- 25 1. I am an attorney at law duly authorized to practice in the State of California. I am a
26 Deputy Attorney General assigned to handle this matter on behalf of defendants.
27 2. True and correct copies of the relevant portions of the deposition of Jay Jacobson, taken
28

1 on November 14, 2023, are attached hereto as Exhibit A. (Jacobson Dep., p. 81:4-23.)

2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct. Executed on September 12, 2024.

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6 Kenneth G. Lake
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EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

FRANKLIN ARMORY, INC., ET AL.,) Case No. 20STCP01747
)
 Plaintiffs-Petitioners,)
)
 vs.)
)
CALIFORNIA DEPARTMENT OF)
JUSTICE, ET AL.,)
)
 Respondents-Defendants.)
_____)

CERTIFIED COPY

VIDEOTAPED DEPOSITION OF JAY L. JACOBSON
 Los Angeles, California
 Tuesday, November 14, 2023

Reported by:

LISA V. BERRYHILL
CSR NO. 7926

Job No.:
45285AGO

1 Was that Mr. Dunham in that video, if you know?

2 A I don't know. I'd have to see the specific video
3 in question.

4 Q How about Ryan Fellows? Is he an employee of
5 Franklin Armory?

6 A Yes, sir.

7 Q It says -- he's listed as Partner, Senior
8 Engineer?

9 A Yes, sir.

10 Q How long has he worked there?

11 A Since we were in California. I want to say
12 '20- -- maybe even 2010.

13 Q As a senior engineer except involved in designing
14 some of the firearms you guys sell?

15 A Most definitely.

16 Q Is he the -- senior engineer, does that mean he's
17 the lead engineer in design work?

18 A So initially, yes. But we have an engineering
19 manager that manages everything going on, on a daily
20 basis, so that frees Ryan up to manage more products than
21 people.

22 Q And he's still with the company; right?

23 A Correct.

24 Q So that's the list that I have for folks with
25 Franklin. So you all had responded to what they call

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DECLARATION OF SERVICE BY ELECTRONIC MAIL

RE: *Franklin Armory, Inc., v. California Department of Justice.*
Case No. 20STCP01747

I declare: I am employed in the City of Los Angeles, County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 300 South Spring Street, Room 1700, Los Angeles, California 90013. On September 12, 2024, I served the documents named below on the parties in this action as follows:

DECLARATION OF KENNETH G. LAKE IN OPPOSITION TO PLAINTIFF’S MOTION TO STRIKE COSTS OR, ALTERNATIVELY, STAY ENFORCEMENT OF JUDGMENT PENDING APPEAL

C.D. Michel
Anna M. Barvir
Jason A. Davis
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Attorneys for Plaintiffs-Petitioners

(BY MAIL) I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Los Angeles, California. I am readily familiar with the practice of the Office of the Attorney General for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

(BY OVERNIGHT DELIVERY) I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, for overnight delivery with the GOLDEN STATE OVERNIGHT courier service.

(BY FACSIMILE) I caused to be transmitted the documents(s) described herein via fax number.

(BY ELECTRONIC MAIL) I caused to be transmitted the documents(s) described herein via electronic mail to the email address(es) listed above.

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

(FEDERAL) I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

Executed on September 12, 2024, at Los Angeles, California.

Sandra Dominguez
Declarant

Sandra Dominguez
Signature