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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

8/27/2024 6:30:07 PM

Clerk of the Superior Court
By N. Lopez, Deputy Clerk

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16 mwold@cooperkirk.com
17 *Admission Pro Hac Vice Pending*

18 Attorneys for Plaintiffs

19 **SUPERIOR COURT OF CALIFORNIA**

20 **COUNTY OF SAN DIEGO**

21 **CENTRAL DIVISION**

22 DANIELLE JAYMES, JOSHUAH GERKEN,
23 SECOND AMENDMENT FOUNDATION,
24 FIREARMS POLICY COALITION,
25 CALIFORNIA RIFLE & PISTOL
26 ASSOCIATION, INC., and NATIONAL
27 RIFLE ASSOCIATION OF AMERICA, INC.,

28 Plaintiffs,

v.

NICOLAS MADUROS, in his official capacity
as Director of the California Department of Tax
and Fee Administration,

Defendant.

Case No.: 37-2024-00031147-CU-MC-CTL

Assigned for all purposes to the Hon. Carolyn Caietti, Department C-70

Unlimited Civil

**NOTICE OF HEARING AND
APPLICATION OF DAVID H.
THOMPSON TO APPEAR PRO HAC
VICE; MEMORANDUM IN SUPPORT;
VERIFIED APPLICATION OF DAVID H.
THOMPSON; DECLARATION OF
JOSHUA ROBERT DALE IN SUPPORT**

Hearing Date: November 8, 2024
Hearing Time: 10:30 AM
Department: C-70
Judge: Hon. Carolyn Caietti

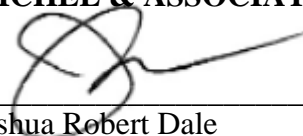
1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on November 8, 2024, at 10:30 AM in Department C-70 of
3 the Superior Court of California, County of San Diego, located at 330 W Broadway, San Diego,
4 CA 92101, this Application to Appear Pro Hac Vice filed on behalf of David H. Thompson will
5 be heard.

6 This application is supported by this Notice, the attached verified application of David H.
7 Thompson, the attached declaration of Joshua Robert Dale, and the [Proposed] Order on this
8 Application.

9
10 Dated: August 26, 2024

MICHEL & ASSOCIATES, P.C.



Joshua Robert Dale
Attorneys for Plaintiffs

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**VERIFIED APPLICATION OF DAVID H. THOMPSON FOR PRO HAC VICE
ADMISSION TO APPEAR AS COUNSEL FOR PLAINTIFFS**

I, David H. Thompson, hereby petition the above-entitled court to permit me to appear and participate in this case, and in support of petition state:

1. My residence address is 6239 Park Road, McLean, Virginia, 22101.

2. My office address is Cooper & Kirk, PLLC, 1523 New Hampshire Avenue, NW, Washington, DC 20036.

3. I was admitted to the State Bar of the District of Columbia, Bar No. 450503, in 1996 and am admitted to all courts of the District of Columbia.

4. I was admitted to, am a member in good standing of, and am eligible to practice before the following federal courts as of the following dates:

U.S. District Court for the:	
District of Columbia	02/02/1998
District of Colorado	02/17/2015
Northern District of Florida	06/17/2008
Western District of Michigan	08/10/2023
U.S. Court of Appeals for the:	
First Circuit	12/12/2017
Second Circuit	04/14/2014
Third Circuit	02/03/2004
Fourth Circuit	09/25/2002
Fifth Circuit	02/26/2009
Sixth Circuit	08/24/2007
Seventh Circuit	04/06/2012
Eighth Circuit	03/29/2017
Ninth Circuit	02/10/1997

Tenth Circuit	08/07/2014
Eleventh Circuit	08/30/2012
Federal Circuit	11/14/2000
D.C. Circuit	01/17/2006
Other Federal Courts:	
U.S. Court of Federal Claims	12/20/1996
U.S. Supreme Court	11/16/1998

5. I am not currently suspended or disbarred in any court.

6. I am not regularly engaged in the practice of law or other business in the State of California.

7. I have filed applications to appear pro hac vice in the following matters in the past two years: *Firearms Policy Coalition, Inc., et al. v. City of Sand Diego, et al.*, No. 3:23-cv-00400 (S.D. Cal.) – filed and granted on April 11, 2023; *Miller, et al. v. Bonta, et al.*, No. 3:22-cv-01446 (S.D. Cal.) – filed on Sept. 27, 2022 and granted on Sept. 28, 2022.

8. Local counsel of record with whom I am associated in this matter is Joshua Robert Dale, SBN 209942, Michel & Associates, P.C., 180 E. Ocean Blvd., Suite 200, Long Beach, CA 90802, (562) 216-4444, jdale@michellawyers.com.

I declare under penalty of perjury of the laws of the State of California and the District of Columbia that the foregoing is true and correct. If called to testify, I would testify to the above facts.

Dated this 26th day of August, 2024, at Washington, D.C.

David H. Thompson, declarant

1 **DECLARATION OF JOSHUA ROBERT DALE IN SUPPORT OF APPLICATION OF**
2 **DAVID H. THOMPSON FOR PRO HAC VICE ADMISSION TO APPEAR AS COUNSEL**
3 **FOR PLAINTIFFS**

4 I, Joshua Robert Dale, declare:

5 1. I am an attorney duly licensed to practice law before all courts of the State of
6 California. My firm, Michel & Associates, P.C., represents Plaintiffs Danielle Jaymes, Joshuah
7 Gerken, Firearms Policy Coalition, The Second Amendment Foundation, California Rifle &
8 Pistol Association, Incorporated, and National Rifle Association of America in the matter of
9 *Jaymes, et al. v. Maduros*. I make this declaration in support of the Application of attorney David
10 H. Thompson to appear pro hac vice in this matter. The following facts are within my personal
11 knowledge and if called as a witness, I can and will competently testify hereto.

12 2. David H. Thompson and his firm Cooper & Kirk, PLLC, of Washington, D.C.,
13 have been directing all of the substantive issues in the case, and Plaintiffs seek to have them serve
14 as trial counsel for the matter.

15 3. I have reviewed and executed the application for the admission pro hac vice of
16 David H. Thompson, and am informed and believe that all the information contained therein is
17 true and correct.

18 4. I am informed and believe that David H. Thompson is a member of the State Bar
19 of the District of Columbia to which he was admitted to practice in 1996.

20 5. This declarant requests that this Court allow David H. Thompson to appear as
21 counsel pro hac vice and to be associated as co-counsel in connection with the above-entitled case
22 and to participate in all aspects thereof, including all trial and pre-trial proceedings.

23 6. I have served a copy of this declaration and the application for admission on the
24 San Francisco offices of the State Bar of California with the necessary fee.

25 I certify and declare under the penalty of perjury under the laws of the State of California
26 that the foregoing is true and correct.

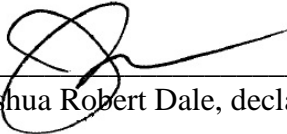
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Executed this 26th day of August, 2024, at Long Beach, California.



Joshua Robert Dale, declarant

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF SAN DIEGO

4 I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California.
5 I am over the age eighteen (18) years and am not a party to the within action. My business address
6 is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

7 On August 27, 2024, I served the foregoing document(s) described as:

8 **NOTICE OF HEARING AND APPLICATION OF DAVID H. THOMPSON TO
9 APPEAR PRO HAC VICE; MEMORANDUM IN SUPPORT; VERIFIED
10 APPLICATION OF DAVID H. THOMPSON; DECLARATION OF JOSHUA
11 ROBERT DALE IN SUPPORT**

12 **[PROPOSED] ORDER ON APPLICATION OF DAVID H. THOMPSON TO
13 APPEAR PRO HAC VICE**

14 on the interested parties in this action by placing

15 the original

16 a true and correct copy

17 thereof by the following means, addressed as follows:

18 Nicolas Maduros (**BY PERSONAL SERVICE**)

19 Director of the California Department of Tax and Fee Administration

20 651 Bannan Street, Suite 100

21 Sacramento, CA 95811-0299

22 *Defendant*

23 Office of Admissions (**BY ELECTRONIC SUBMISSION**)

24 The State Bar of California

25 180 Howard Street

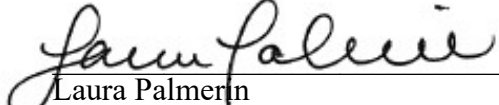
26 San Francisco, CA 94105

27 (**BY MAIL**) As follows: I am "readily familiar" with the firm's practice of collection and
28 processing correspondence for mailing. Under the practice it would be deposited with the
U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach,
California, in the ordinary course of business. I am aware that on motion of the party
served, service is presumed invalid if postal cancellation date is more than one day after
date of deposit for mailing an affidavit.

(**PERSONAL SERVICE**) I caused said document(s) to be personally delivered by a
courier to each addressee.

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

Executed on August 27, 2024, at Long Beach, California.


Laura Palmerin