

1 C.D. Michel – SBN 144258
2 Joshua Robert Dale – SBN 209942
3 Konstadinos T. Moros – SBN 306610
4 Tiffany D. Chevront – SBN 317144
5 MICHEL & ASSOCIATES, P.C.
6 180 E. Ocean Blvd., Suite 200
7 Long Beach, CA 90802
8 Telephone: (562) 216-4444
9 Facsimile: (562) 216-4445
10 Email: cmichel@michellawyers.com

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

8/27/2024 6:34:31 PM

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

6 David H. Thompson
7 Peter A. Patterson
8 Megan M. Wold
9 COOPER & KIRK, PLLC
10 1523 New Hampshire Ave N.W.
11 Washington, D.C. 20036
12 Telephone: (202) 220-9600
13 Facsimile: (202) 220-9601
14 dthompson@cooperkirk.com
15 ppatterson@cooperkirk.com
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 MEGAN M. WOLD
TO APPEAR PRO HAC VICE;
MEMORANDUM IN SUPPORT;
VERIFIED APPLICATION OF MEGAN
M. WOLD; 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 on behalf of Megan M. Wold will be heard.

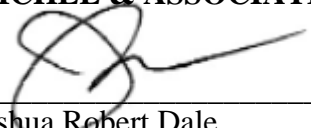
5 This application is supported by this Notice, the attached verified application of Megan M.
6 Wold, the attached declaration of Joshua Robert Dale, and the [Proposed] Order on this
7 Application

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9 Dated: August 26, 2024

MICHEL & ASSOCIATES, P.C.

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Joshua Robert Dale
Attorneys for Plaintiffs

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2 **MEMORANDUM IN SUPPORT OF APPLICATION OF MEGAN M. WOLD TO**
3 **APPEAR PRO HAC VICE FOR PLAINTIFFS**

4 Rule 9.40 of the California Rules of Court governs applications of counsel to appear pro
5 hac vice. The rule requires counsel desiring to appear pro hac vice to file a verified application
6 with proof of service by mail in accordance with Code of Civil Procedure section 1013a of a copy
7 of the application and of the notice of hearing of the application on all parties who have appeared
8 in the cause and on the State Bar of California.

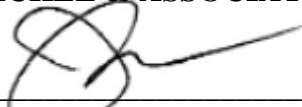
9 The attached verified application of Megan M. Wold shows that Megan M. Wold satisfies
10 the requirements of Rule 9.40 for admission to appear in this action pro hac vice as counsel for
11 Plaintiffs. Megan M. Wold is not a licensee of the State Bar of California or a resident of the State
12 of California; is not regularly employed in the State of California; is not regularly engaged in
13 substantial business, professional, or other activities in the State of California; is an attorney in
14 good standing of and eligible to practice before the bars of the District of Columbia and Ohio; and
15 has been retained to appear in this action.

16 Counsel for Plaintiffs has notified and provided copies of this application and supporting
17 documents to the State Bar of California and submitted the required fifty-dollar fee for the
18 application of Megan M. Wold.

19 Based on these facts and the supporting information provided in the attached verified
20 application of Megan M. Wold and declaration of Joshua Robert Dale, counsel for Plaintiffs
21 hereby requests that Megan M. Wold be permitted to appear as counsel pro hac vice for Plaintiffs
22 in this action.

23 Dated: August 26, 2024

MICHEL & ASSOCIATES, P.C.

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25 _____
26 Joshua Robert Dale
27 Attorneys for Plaintiffs
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1 **VERIFIED APPLICATION OF MEGAN M. WOLD FOR PRO HAC VICE ADMISSION**
2 **TO APPEAR AS COUNSEL FOR PLAINTIFFS**

3 I, Megan M. Wold, hereby petition the above-entitled court to permit me to appear and
4 participate in this case, and in support of this petition state:

5 1. My residence address is 2009 N. Harrison Boulevard, Boise, ID 83702.

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

8 3. I was admitted to the State Bar of Ohio, Registration No. 90227, in 2013, and am
9 admitted to all courts of Ohio.

10 4. I was admitted to the State Bar of the District of Columbia, Bar No. 198005, in
11 2018, and am admitted to all courts of the District of Columbia.

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

14

U.S. Court of Appeals for the:	
Second Circuit	02/10/2016
Fifth Circuit	09/13/2018
Sixth Circuit	08/26/2013
Eleventh Circuit	02/12/2016
Other Federal Court:	
U.S. Supreme Court	10/02/2017

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22 6. I am not currently suspended or disbarred in any court.

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

25 8. I have not filed applications to appear pro hac vice in matters in California within
26 the past two years.

27 9. Local counsel of record with whom I am associated in this matter is Joshua Robert
28 Dale, SBN 209942, Michel & Associates, P.C., 180 E. Ocean Blvd., Suite 200, Long Beach, CA

1 90802, (562) 216-4444, jdale@michellawyers.com.

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

5 Dated this 26th day of August, 2024, at Boise, ID.

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9 **Megan M. Wold, declarant**

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1 **DECLARATION OF JOSHUA ROBERT DALE IN SUPPORT OF APPLICATION OF**
2 **MEGAN M. WOLD 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
10 Megan M. Wold 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. Megan M. Wold and her firm Cooper & Kirk, PLLC, of Washington, D.C., have
13 been directing all of the substantive issues in the case and Plaintiffs seek to have them serve as
14 trial counsel for the matter.

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

18 4. I am informed and believe that Megan M. Wold is a member of the State Bar of
19 Ohio to which she was admitted to practice in 2013, and a member of the State Bar of the District
20 of Columbia to which she was admitted to practice in 2018.

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

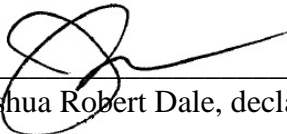
24 6. I have served a copy of this declaration and the application for admission on the
25 San Francisco offices of the State Bar of California with the necessary fee.

26 I certify and declare under the penalty of perjury under the laws of the State of California
27 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

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PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

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

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

NOTICE OF HEARING AND APPLICATION OF MEGAN M. WOLD TO APPEAR PRO HAC VICE; MEMORANDUM IN SUPPORT; VERIFIED APPLICATION OF MEGAN M. WOLD; DECLARATION OF JOSHUA ROBERT DALE IN SUPPORT

[PROPOSED] ORDER ON APPLICATION OF MEGAN M. WOLD TO APPEAR PRO HAC VICE

on the interested parties in this action by placing
 the original
 a true and correct copy
thereof by the following means, addressed as follows:

Nicolas Maduros **(BY PERSONAL SERVICE)**
Director of the California Department of Tax and Fee Administration
651 Bannon Street, Suite 100
Sacramento, CA 95811-0299
Defendant

Office of Admissions **(BY ELECTRONIC SUBMISSION)**
The State Bar of California
180 Howard Street
San Francisco, CA 94105

- (BY MAIL)** As follows: I am “readily familiar” with the firm’s practice of collection and 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