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ELECTRONICALLY FILED  
Superior Court of California,  
County of San Diego

8/27/2024 6:32:17 PM

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

6 David H. Thompson\*  
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12 \*Admission Pro Hac Vice Pending

13 Attorneys for Plaintiffs

14 **SUPERIOR COURT OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

16 **CENTRAL DIVISION**

17 DANIELLE JAYMES, JOSHUAH GERKEN,  
SECOND AMENDMENT FOUNDATION,  
18 FIREARMS POLICY COALITION,  
CALIFORNIA RIFLE & PISTOL  
19 ASSOCIATION, INC., and NATIONAL  
RIFLE ASSOCIATION OF AMERICA, INC.,

20 Plaintiffs,

21 v.

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

24 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 PETER A.  
PATTERSON TO APPEAR PRO HAC  
VICE; MEMORANDUM IN SUPPORT;  
VERIFIED APPLICATION OF PETER A.  
PATTERSON; DECLARATION OF  
JOSHUA ROBERT DALE IN SUPPORT**

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

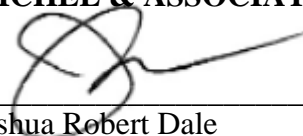
1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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 Peter A. Patterson will be  
5 heard.

6 This application is supported by this Notice, the attached verified application of Peter A.  
7 Patterson, 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.**



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Joshua Robert Dale  
Attorneys for Plaintiffs

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1                   **VERIFIED APPLICATION OF PETER A. PATTERSON FOR PRO HAC VICE**  
2                   **ADMISSION TO APPEAR AS COUNSEL FOR PLAINTIFFS**

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

- 5                   1.       My residence address is 4104 Durham’s Crossing, Cincinnati, OH 45245.  
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 the District of Columbia, Bar No. 998668, in  
9 2011 and am admitted to all courts of the District of Columbia.  
10                  4.       I was admitted to, am a member in good standing of, and am eligible to practice  
11 before the following federal courts as of the following dates:

<b>U.S. District Court for the:</b>	
Southern District of Ohio	07/06/2010
District of Columbia	08/05/2013
<b>U.S. Court of Appeals for the:</b>	
First Circuit	12/12/2017
Second Circuit	04/14/2014
Third Circuit	06/14/2018
Fourth Circuit	05/10/2011
Fifth Circuit	11/29/2011
Sixth Circuit	12/10/2006
Seventh Circuit	04/06/2012
Eighth Circuit	03/29/2017
Ninth Circuit	08/12/2010
Tenth Circuit	08/07/2014
Eleventh Circuit	08/22/2012

Federal Circuit	10/26/2010
D.C. Circuit	10/15/2014
<b>Other Federal Courts:</b>	
U.S. Court of Federal Claims	07/22/2013
U.S. Supreme Court	02/19/2013

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:

a. U.S. District Court for the Southern District of California in *Miller v. Bonta*, Case No. 3:22-cv-01446, application filed on September 28, 2022, and granted; and

b. U.S. District Court for the Southern District of California in *Firearms Policy Coalition, Inc. v. City of San Diego*, Case No. 3:23-cv-00400, application filed on April 11, 2023, and granted.

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](mailto: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 26<sup>th</sup> day of August, 2024, at Boise, ID.



Peter A. Patterson, declarant

1           **DECLARATION OF JOSHUA ROBERT DALE IN SUPPORT OF APPLICATION OF**  
2           **PETER A. PATTERSON FOR PRO HAC VICE ADMISSION TO APPEAR AS**  
3           **COUNSEL 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 Peter  
10          A. Patterson 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.       Peter A. Patterson and his 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          Peter A. Patterson, and am informed and believe that all the information contained therein is true  
17          and correct.

18          4.       I am informed and believe that Peter A. Patterson is a member of the State Bar of  
19          the District of Columbia to which he was admitted to practice in 2011.

20          5.       This declarant requests that this Court allow Peter A. Patterson 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.

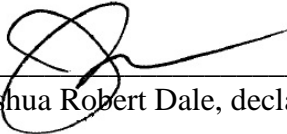
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Executed this 26<sup>th</sup> day of August, 2024, at Long Beach, California.

  
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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 PETER A. PATTERSON TO  
9 APPEAR PRO HAC VICE; MEMORANDUM IN SUPPORT; VERIFIED  
10 APPLICATION OF PETER A. PATTERSON; DECLARATION OF JOSHUA  
11 ROBERT DALE IN SUPPORT**

12 **[PROPOSED] ORDER ON APPLICATION OF PETER A. PATTERSON 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 Bannon 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