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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
12/9/2024 11:15:04 AM

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

6 David H. Thompson*
7 Peter A. Patterson*
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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

**EX PARTE APPLICATION OF MEGAN
M. WOLD TO APPEAR PRO HAC VICE;
VERIFIED APPLICATION OF MEGAN
M. WOLD; DECLARATION OF JOSHUA
ROBERT DALE IN SUPPORT;
DECLARATION OF LAURA FERA (NÉE
PALMERIN) IN SUPPORT; [PROPOSED]
ORDER**

Application Date: December 11, 2024
Application Time: 8:30 AM
Department: C-70
Judge: Hon. Carolyn Caietti

1 **EX PARTE APPLICATION OF MEGAN M. WOLD TO APPEAR PRO HAC VICE FOR**
2 **PLAINTIFFS**

3 Megan M .Wold hereby applies ex parte to be admitted pro hac vice to appear in the
4 above-entitled matter. This application is supported by this application, the attached verified
5 application of Megan M. Wold, the attached declaration of Joshua Robert Dale, the attached
6 Declaration of Laura Fera (née Palmerin), and the [Proposed] Order on this Application.

7 Applicant has, though California counsel, given notice of this application prior to 10:00
8 a.m. the date before the application hearing to Defendant’s counsel in conformance with
9 California Rule of Court 3.1204 as set forth in the attached Dale Declaration. Counsel for
10 Defendant has previously stated that they do not intend to oppose the application.

11 **GROUND FOR ADMISSION**

12 Rule 9.40 of the California Rules of Court governs applications of counsel to appear pro
13 hac vice. The rule requires counsel desiring to appear pro hac vice to file a verified application
14 with proof of service by mail in accordance with Code of Civil Procedure section 1013a of a copy
15 of the application and of the notice of hearing of the application on all parties who have appeared
16 in the cause and on the State Bar of California. Per the Court’s local practice, where a pro hac
17 vice admission application is unopposed, a party may seek and be admitted pro hac vice upon ex
18 parte application to the Court.

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

26 Counsel for Plaintiffs has notified and provided copies of this application and supporting
27 documents to the State Bar of California and submitted the required fifty-dollar fee for the
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1 application of Megan M. Wold. The State Bar has responded and approved the application. (See
2 **Exhibit A** to the Declaration of Laura Fera (née Palmerin).)

3 Based on these facts and the supporting information provided in the attached verified
4 application of Megan M. Wold and declarations of Joshua Robert Dale and Laura Fera, counsel
5 for Plaintiffs hereby requests that Megan M. Wold be permitted to appear as counsel pro hac vice
6 for Plaintiffs in this action.

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8 Dated: December 9, 2024

MICHEL & ASSOCIATES, P.C.



Joshua Robert Dale
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:

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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 6th day of December, 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. As set forth in the
26 corresponding declaration of my paralegal Laura Fera, the State Bar has responded and approved
27 her application.

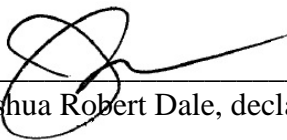
28 7. On November 4, 2024, I exchanged emails with counsel for Defendant, Angela
 Zugman, Esq., identifying that we intended to present these applications on an ex parte basis. Ms.

1 Zugman responded and stated that Defendant would not oppose the applications for admission.
2 Thereafter, following receipt of a date from the court to present this application, on November 12,
3 2024, I informed Defendant's counsel that the hearing on this application would be held on
4 November 14, 2024 at 8:30 a.m. in Department C-70.

5 8. Following the court continuing the hearing on this application, on December 6,
6 2024, at 5:22 PM, I further informed Defendant's counsel via email that a subsequent hearing to
7 address the court's concerns about documentation of the State Bar's approval of this application
8 was required. Therefore, we would be further appearing for a hearing on this application on
9 December 11, 2024, at 8:30 a.m. in Department C-70.

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

12 Executed this 9th day of December, 2024, at Long Beach, California.

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16 Joshua Robert Dale, declarant
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1 **DECLARATION OF LAURA FERA (NÉE PALMERIN) IN SUPPORT OF**
2 **APPLICATION OF MEGAN M. WOLD FOR PRO HAC VICE ADMISSION TO**
3 **APPEAR AS COUNSEL FOR PLAINTIFFS**

4 I, Laura Fera (née Palmerin), declare:

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

12 2. On August 27, 2024, I submitted on behalf of applicants David H. Thompson,
13 Peter A. Patterson, and Megan M. Wold a Pro Hac Vice application to the State Bar of California
14 along with an application fee of \$50 each.

15 3. On October 7, 2024, I received notice via email from the State Bar stating that Mr.
16 Patterson’s and Ms. Wold’s applications had been approved. A true and correct copy of the State
17 Bar’s approval email for Ms. Wold is attached hereto as Exhibit “A.”

18 4. I married and changed my legal surname to Fera in November.

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

21 Executed this 9th day of December, 2024, at Long Beach, California.

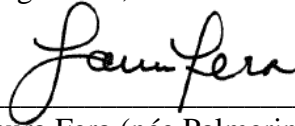
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23 _____
24 Laura Fera (née Palmerin), declarant

EXHIBIT A

From: [State Bar of California - Special Admissions](#)
To: mwold@cooperkirk.com; [Laura Palmerin](#)
Subject: Pro Hac Vice Application Approval Notice
Date: Monday, October 7, 2024 1:43:48 PM



Application's Case Number: 01103271
Trial Case Name: Jaymes v. Maduros
Trial Case Number: 37-2024-00031147-CU-MC-CTL

Dear Megan M. Wold,

Your Pro Hac Vice application has been successfully filed and approved with the State Bar of California, Office of Admissions.

The successful filing of this application is restricted to the above case only.

Any future documents relating to this particular case must be provided to the State Bar by responding directly to this email, with the document(s) attached. Please do not mail any physical documents to the Admissions office.

If you have any questions regarding this matter, please contact the Special Admissions department at the number below.

Sincerely,

Office of Admissions
State Bar of California | 845 S. Figueroa Street | Los Angeles, CA 90017
(415) 538-2300 | www.calbar.ca.gov/Admissions

Working to protect the public in support of the mission of the State Bar of California.

Please consider the environment before printing this email.

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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF SAN DIEGO

4 I, Laura Fera, am employed in the City of Long Beach, Los Angeles County, California. I
5 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 December 9, 2024, I served the foregoing document(s) described as:

8 **EX PARTE APPLICATION OF MEGAN M. WOLD TO APPEAR PRO HAC
9 VICE; VERIFIED APPLICATION OF MEGAN M. WOLD; DECLARATION OF
10 JOSHUA ROBERT DALE IN SUPPORT; DECLARATION OF LAURA FERA
11 (NÉE PALMERIN) IN SUPPORT**

12 **[PROPOSED] ORDER ON APPLICATION OF MEGAN M. WOLD TO APPEAR
13 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 Kara Siegel
19 Kara.Siegel@doj.ca.gov
20 Angela K. Zugman
21 Angela.Zugman@doj.ca.gov
22 Office of the Attorney General
23 600 West Broadway, Suite 1800
24 San Diego, CA 92101
25 *Attorneys for Defendant*

- 26 (**BY MAIL**) As follows: I am “readily familiar” with the firm’s practice of collection and
27 processing correspondence for mailing. Under the practice it would be deposited with the
28 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.
- (**BY ELECTRONIC MAIL**) As follows: I served a true and correct copy by electronic
transmission. Said transmission was reported and completed without error.

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

Executed on December 9, 2024, at Long Beach, California.



Laura Fera

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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