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Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc.
7 (D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California, Inc., Gun Owners of
America, Inc., Gun Owners Foundation, and California Rifle & Pistol Association,
8 Incorporated

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 ADAM RICHARDS, et al.,
17 Plaintiffs,
18 v.
19 GAVIN NEWSOM, et al.,
20 Defendants.

Case No.: 8:23-cv-02413 JVS (KESx)
**PLAINTIFFS’ NOTICE OF APPEAL
AND REPRESENTATION
STATEMENT**
Action Filed: December 19, 2023

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1 NOTICE IS HEREBY GIVEN that Plaintiffs Adam Richards, Jeffrey
2 Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting Range, LLC,
3 Gaalswyk Enterprises, Inc. (D/B/A/ Smokin’ Barrel Firearms), Gun Owners of
4 California, Inc., Gun Owners of America, Inc., Gun Owners Foundation, California
5 Rifle & Pistol Association, Incorporated, and The Second Amendment Foundation,
6 hereby appeal to the United States Court of Appeals for the Ninth Circuit from the
7 Order entered in this action October 16, 2024 (ECF No. 49).

8 Plaintiffs’ Representation Statement is attached to this Notice as required by
9 Ninth Circuit Rule 3-2(b).

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Dated: November 12, 2024

MICHEL & ASSOCIATES, P.C.

s/ Joshua Robert Dale

Joshua Robert Dale
Attorneys for Plaintiffs Adam Richards,
Jeffrey Vandermeulen, Gerald Clark, Jesse
Harris, On Target Indoor Shooting Range,
LLC, Gaalswyk Enterprises, Inc. (D/B/A/
Smokin’ Barrel Firearms), Gun Owners of
California, Inc., Gun Owners of America, Inc.,
Gun Owners Foundation, and California Rifle
& Pistol Association, Incorporated

Dated: November 12, 2024

LAW OFFICES OF DONALD KILMER, APC

s/ Donald Kilmer

Donald Kilmer
Attorney for Plaintiff The Second Amendment
Foundation

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REPRESENTATION STATEMENT

The undersigned represents Plaintiffs-Appellants, Adam Richards, Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc. (D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California, Inc., Gun Owners of America, Inc., Gun Owners Foundation, California Rifle & Pistol Association, Incorporated, and The Second Amendment Foundation, and no other party. Pursuant to Rule 12(b) of the Federal Rules of Appellate Procedure and Circuit Rule 3-2(b), Plaintiffs-Appellants submit this Representation Statement. The following list identifies all parties to the action, and it identifies their respective counsel by name, firm, address, telephone number, and e-mail, where appropriate.

| PARTIES | COUNSEL OF RECORD |
|---|---|
| Plaintiffs-Appellants Adam Richards; Jeffrey Vandermeulen; Gerald Clark; Jesse Harris; On Target Indoor Shooting Range, LLC; Gaalswyk Enterprises, Inc. (D/B/A/ Smokin’ Barrel Firearms); Gun Owners of California, Inc.; Gun Owners of America, Inc.; Gun Owners Foundation; California Rifle & Pistol Association, Incorporated | C. D. Michel – SBN 144258 Email: cmichel@michellawyers.com Tiffany D. Chevront – SBN 317144 Email: tcheuvront@michellawyers.com Joshua Robert Dale – SBN 209942 Email: jdale@michellawyers.com MICHEL & ASSOCIATES, P.C. 180 E. Ocean Blvd., Suite 200 Long Beach, CA 90802 Telephone: (562) 216-4444 Facsimile: (562) 216-4445 Counsel is registered for Electronic Filing in the Ninth Circuit |
| Plaintiff-Appellant The Second Amendment Foundation | Donald Kilmer – SBN 179986 Email: don@dklawoffice.com Law Offices of Donald Kilmer, APC 14085 Silver Ridge Road Caldwell, Idaho 83607 Telephone: (408) 264-8489 Counsel is registered for Electronic Filing in the Ninth Circuit |

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| <p>Defendant-Appellee Robert Bonta, in his official capacity as Attorney General of the State of California</p> | <p>Todd Grabarsky – SBN 286999 Deputy Attorney General todd.grabarsky@doj.ca.gov Christina R.B. Lopez Deputy Attorney General christina.lopez@doj.ca.gov Carolyn Downs carolyn.downs@doj.ca.gov Office of the Attorney General for California 300 South Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 269-6044 Fax: (916) 731-2124</p> |
|---|--|

ATTESTATION OF E-FILED SIGNATURES

I, Joshua Robert Dale, am the ECF User whose ID and password are being used to file this PLAINTIFFS’ NOTICE OF APPEAL AND REPRESENTATION STATEMENT. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: November 12, 2024

s/ Joshua Robert Dale

Joshua Robert Dale

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Richards, et al. v. Newsom, et al.*
Case No.: 8:23-cv-02413 JVS (KESx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

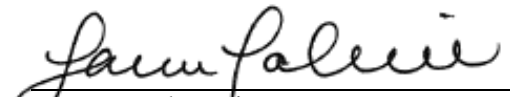
**PLAINTIFFS’ NOTICE OF APPEAL AND REPRESENTATION
STATEMENT**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

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Telephone: (213) 269-6044
Attorneys for Defendants

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

Executed November 13, 2024.



Laura Palmerin