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9 *official capacity as Director of the California*  
*Department of Tax and Fee Administration*

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SAN DIEGO

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

19 **Plaintiffs,**

20 **v.**

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

23 **Defendant.**  
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**Exempt from Filing Fees --**  
**Gov't Code § 6103**

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

**DECLARATION OF JENNIFER T.**  
**HENDERSON IN SUPPORT OF**  
**DEFENDANT NICOLAS MADUROS'**  
**DEMURRER TO FIRST AMENDED**  
**COMPLAINT**

Date: September 5, 2025  
Time: 10:30 a.m.  
Dept: C-70  
Judge: Hon. Carolyn Caietti  
Trial Date: None Set  
Action Filed: July 2, 2024

1 I, Jennifer Henderson, declare as follows:

2 1. I am an attorney licensed to practice law before the courts of the State of  
3 California. I am a Deputy Attorney General with the California Department of Justice and am  
4 counsel to defendant Nicolas Maduros, in his official capacity as the Director of the California  
5 Department of Tax and Fee Administration. I make this declaration as provided by Code of Civil  
6 Procedure section 430.41, subdivision (a).

7 2. I make this declaration in support of defendant's demurrer to plaintiffs' first  
8 amended complaint in this action. The following information is true and correct and based on my  
9 personal knowledge and, if called to do so, I could and would competently testify to it.

10 3. On February 5, 2025, my co-counsel Deputy Attorney General Angela Zugman  
11 and I met and conferred by teleconference with Plaintiffs' counsel, Peter Patterson and Anna  
12 Barvir, regarding defendant's plan to demur to the first amended complaint. During our  
13 telephonic meet and confer, Ms. Zugman and I explained defendant's positions regarding the  
14 defects in the operative complaint and provided Mr. Patterson and Ms. Barvir with the basis for  
15 those positions. We discussed our clients' relative positions on the various issues, but the parties  
16 were unable to resolve the matters to be raised in defendant's demurrer.

17 4. We also discussed our calendars to avoid a scheduling conflict for counsel when  
18 reserving a hearing date.

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

21 Executed on February 18, 2025 at Sacramento, California

22  
23 */s/ Jennifer T. Henderson*

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Jennifer T. Henderson