

Case No. 25-693

---

---

In the United States Court of Appeals  
for the Ninth Circuit

---

ADAM RICHARDS, et al.,  
*Plaintiffs-Appellants,*

v.

GAVIN NEWSOM,  
in his official capacity as Governor of the State of California,  
*Defendants-Appellees.*

---

On Appeal from the United States District Court  
for the Central District of California  
Case No. 8:23-cv-02413 JVS (KESx)

---

**APPELLANTS' EXCERPTS OF RECORD  
INDEX VOLUME**

---

C.D. Michel  
Anna M. Barvir  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
Long Beach, CA 90802  
(562) 216-4444  
[cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)

Donald Kilmer  
Law Offices of Donald Kilmer, APC  
14085 Silver Ridge Rd.  
Caldwell, Idaho 83607  
(408) 264-8489  
[don@dklawoffice.com](mailto:don@dklawoffice.com)

*Attorneys for Plaintiffs-Appellants*

---

---

May 27, 2025

Per Ninth Circuit rule 30-1.5, 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 Second Amendment Foundation submit the following Excerpts of Record, filed concurrently with their Opening Brief.

<b>Date</b>	<b>ECF</b>	<b>Description</b>	<b>Page</b>
<b>Volume 1</b>			
01/28/25	58	Judgment	2
10/16/24	49	Order re Motion to Dismiss	3
<b>Volume 2</b>			
11/12/24	50	Notice re Plaintiffs' Failure to File a Second Amended Complaint	32
08/02/24	41-1	Declaration of Deputy Attorney General Todd Grabarsky in Support of Defendant's Motion to Dismiss Amended Complaint	35
08/02/24	41-2	Request for Judicial Notice in Support of Defendant's Motion to Dismiss Amended Complaint	241
06/28/24	39	Amended and Supplemental Complaint for Declaratory & Injunctive Relief	245
<b>Volume 3</b>			
03/01/24	28	Order re Preliminary Injunction	322
12/21/23	11-2	Declaration of Tiffany D. Chevront in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	345
12/21/23	11-12	Declaration of Samuel A. Paredes in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	349

<b>Date</b>	<b>ECF</b>	<b>Description</b>	<b>Page</b>
12/21/23	11-11	Declaration of Robert Gaalswyk in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	357
12/21/23	11-10	Declaration of Richard Minnich in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	363
12/21/23	11-9	Declaration of Jesse Harris in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	369
12/21/23	11-8	Declaration of Jeffrey Vandermeulen in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	375
12/21/23	11-7	Declaration of Gregg L. Bouslog in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	380
12/21/23	11-6	Declaration of Gerald Clark in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	385
12/21/23	11-5	Declaration of Erich M. Pratt in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	391
12/21/23	11-4	Declaration of Alan Gottlieb in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	398
12/21/23	11-3	Declaration of Adam Richards in Support of Plaintiffs' Application for Temporary Restraining Order and Issuance of Preliminary Injunction	404
12/20/23	5-11	Declaration of Samuel A. Paredes in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	409
12/20/23	5-10	Declaration of Robert Gaalswyk in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	416

<b>Date</b>	<b>ECF</b>	<b>Description</b>	<b>Page</b>
12/20/23	5-9	Declaration of Richard Minnich in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	421
12/20/23	5-8	Declaration of Jesse Harris in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	426
12/20/23	5-7	Declaration of Jeffrey Vandermeulen in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	431
12/20/23	5-6	Declaration of Gregg L. Bouslog in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	435
12/20/23	5-5	Declaration of Gerald Clark in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	439
12/20/23	5-4	Declaration of Erich M. Pratt in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	444
12/20/23	5-3	Declaration of Alan Gottlieb in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	450
12/20/23	5-2	Declaration of Adam Richards in Support of Plaintiffs' Motion for Temporary Restraining Order and Issuance of Preliminary Injunction	455
<b>Volume 4</b>			
12/19/23	1	Complaint for Declaratory & Injunctive Relief	461
12/19/23	1-1	Exhibit 1 to Complaint for Declaratory & Injunctive Relief	576
12/19/23	1-2	Declaration of Adam Richards in Support of Complaint	588
12/19/23	1-3	Declaration of Jeffrey Vandermeulen in Support of Complaint	591

<b>Date</b>	<b>ECF</b>	<b>Description</b>	<b>Page</b>
12/19/23	1-4	Declaration of Gerald Clark in Support of Complaint	594
12/19/23	1-5	Declaration of Jesse Harris in Support of Complaint	598
12/19/23	1-6	Declaration of Gregg L. Bouslog in Support of Complaint	602
12/19/23	1-7	Declaration of Robert Gaalswyk in Support of Complaint	605
12/19/23	1-8	Declaration of Samuel A. Paredes in Support of Complaint	609
12/19/23	1-9	Declaration of Richard Minnich in Support of Complaint	615
12/19/23	1-10	Declaration of Erich M. Pratt in Support of Complaint	619
12/19/23	1-11	Declaration of Alan Gottlieb in Support of Complaint	624
01/31/25	59	Plaintiffs' Notice of Appeal and Representation Statement	628
--	--	Trial Court Docket	633

Respectfully submitted,

Dated: May 27, 2025

**MICHEL & ASSOCIATES, P.C.**

s/ Anna M. Barvir

Anna M. Barvir

*Attorneys for Plaintiffs-Appellants Adam Richards, Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting Range, LLC, Gaalsnyk 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: May 27, 2025

**LAW OFFICES OF DONALD KILMER, APC**

s/ Donald Kilmer

Donald Kilmer

*Attorney for Plaintiff-Appellant Second Amendment  
Foundation*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2025, an electronic PDF of **APPELLANTS' EXCERPTS OF RECORD, INDEX VOLUME**, was uploaded to the Court's CM/ECF system, which will automatically generate and send by electronic mail a Notice of Docket Activity to all registered attorneys participating in the case. Such notice constitutes service on those registered attorneys.

Dated: May 27, 2025

Respectfully submitted,

**MICHEL & ASSOCIATES, P.C.**

s/ Anna M. Barvir

\_\_\_\_\_  
Anna M. Barvir

*Attorneys for Plaintiffs-Appellants*