

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
IN AND FOR THE SECOND APPELLATE DISTRICT

FRANKLIN ARMORY, INC., and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs and Appellants,

v.

CALIFORNIA DEPARTMENT OF  
JUSTICE, XAVIER BECERRA, in his  
Official Capacity as Attorney General  
for the State of California, and DOES 1-  
10,

Defendants and Respondents.

Case No. B340913

**DECLARATION OF JASON A. DAVIS IN SUPPORT OF  
APPELLANTS' REQUEST FOR JUDICIAL NOTICE, OR  
ALTERNATIVELY, MOTION TO TAKE EVIDENCE  
[California Rules of Court, rules 8.252(a), 8.252(c)]**

Superior Court of California, County of Los Angeles  
Case No. 20STCP01747  
Honorable Daniel S. Murphy, Judge

C.D. Michel – SBN 144258  
Jason A. Davis – SBN 224250  
Anna M. Barvir – SBN 268728  
Konstadinos T. Moros – SBN 306610  
MICHEL & ASSOCIATES, P.C.  
180 East Ocean Blvd., Suite 200  
Long Beach, CA 90802  
Telephone: (562) 216-4444  
Email: [abarvir@michellawyers.com](mailto:abarvir@michellawyers.com)

*Counsel for Plaintiffs-Appellants*

I, Jason A. Davis, declare as follows:

1. I am an attorney licensed to practice law in the state of California. I am Of Counsel for the law firm Michel & Associates, P.C. (“MAPC”), attorneys of record for Plaintiffs-Appellants in this action. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto.

2. This declaration is submitted in support of Appellants’ Request for Judicial Notice, or Alternatively, Motion to Take Evidence, pursuant to California Rules of Court, rules 8.252(a) and 8.252(c), concerning documents obtained through a Public Records Act (PRA) request from the California Department of Justice (DOJ).

3. On July 1, 2024, I submitted a Public Records Act (PRA) request (DOJ No. 2024-01755) to the California Department of Justice, seeking records related to modifications or enhancements to the Dealer Record of Sale Entry System (DES). The request sought writings, as defined by Evidence Code section 250, including but not limited to: (a) enhancements to the DES to add a field for firearms that are neither rifles, shotguns, nor handguns, including those defined as “Other”; (b) notices to licensed California dealers about DES changes for such firearms; (c) notices to law enforcement about such firearms; and (d) the DES JIRA Log, all from October 1, 2019, to December 31, 2020.

4. The complete response, including the documents at issue in this motion, was not provided until April 15, 2025, well after the entry of judgment in the underlying action and just weeks before Appellants' brief in this appeal was due.

5. Attached as **Exhibit A** is a true and correct copy of the DOJ's response to PRA Request No. 2024-01755, dated April 15, 2025, issued by the Department of Justice Bureau of Firearms, signed by Sidney Villareal, Staff Services Manager I, on behalf of Attorney General Rob Bonta.

6. Attached as **Exhibit B** is a true and correct copy of a DES JIRA Log, dated April 15, 2025, covering entries created from October 1, 2019, to December 31, 2020, attached to and provided as part of the DOJ's April 15, 2025, response.

7. On October 11, 2022, during discovery in the underlying action, Appellants expressly requested from Respondent DOJ all documents related to DES enhancements from Respondents, including any and all entries into the JIRA database for DES field modifications dated or prepared on or after January 1, 2014, including but not limited to time logs, time estimates, or time billed.

8. Appellants similarly requested all documents dated or prepared on or after January 1, 2019, related to any entry into the JIRA database regarding "undefined firearm subtypes," a phrase regularly used by the parties in this litigation to refer to the

firearms at the heart of this dispute and which were defined as “any firearm that is neither a rifle, nor a shotgun, nor a handgun”

9. Despite these requests and the clearly defined dates covered by Appellants’ requests, Respondents failed to produce the documents now attached as Exhibit B, or any substantially similar records, depriving Appellants of critical evidence before trial.

10. Respondents did, however, respond to the above requests in May 2023, producing 26 pages of JIRA entries created in August and September 2021. These 26 pages did not include the pages received in response to PRA Request No. 2024-01755 (and marked as Exhibit B) or the relevant JIRA entries created in January and February 2020.

11. On June 19, 2024, in response to Appellants’ request that Respondents supplement their discovery responses pursuant to Code of Civil Procedure section 2031.050, Respondents provided boilerplate objections to the requests but nonetheless produced the same 26 pages of JIRA entries created in August and September 2021.

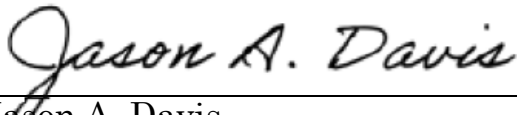
12. The withheld documents are relevant to this appeal because their existence demonstrates that the Respondents withheld evidence that could have altered the course of the litigation. Specifically, the DES JIRA Log (Ex. B) includes entries (e.g., DES-1577, DES-1580, DES-1585) indicating modifications to the DES to accommodate an “Other” gun type, which may

contradict Respondents' representations to the trial court about when they began to implement the needed DES changes.

13. The withholding of these documents unfairly prejudiced Appellants, preventing them from conducting further discovery on issues central to the case and from identifying potential witnesses, such as DOJ personnel directly responsible for work related to the relevant DES enhancement project(s).

14. The DOJ either inadvertently failed to produce these highly relevant documents in discovery, or worse, intentionally withheld them. Regardless, either scenario constitutes an exceptional circumstance justifying the Court's consideration of these documents on appeal, either through judicial notice of their existence under Evidence Code section 452, subdivisions (c) and (h), or as additional evidence under Code of Civil Procedure section 909.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 21, 2025, at Mission Viejo, California.

  
\_\_\_\_\_  
Jason A. Davis  
Attorneys for Plaintiffs-Appellants

# **EXHIBIT A**



C A L I F O R N I A  
DEPARTMENT OF JUSTICE

**Rob Bonta**  
**Attorney General**

DIVISION OF LAW ENFORCEMENT  
BUREAU OF FIREARMS  
P.O. BOX 160487  
SACRAMENTO, CA 95816-0487  
Telephone: (916)210-2364  
E-Mail Address: BOFrecordsrequests@doj.ca.gov

April 15, 2025

***Via Email to:***

Jason Davis  
jason@calgunlawyers.com

RE: Public Records Act Request; DOJ No. 2024-01755

Dear Jason Davis:

This letter is in response to your correspondence received by the California Department of Justice (Department) on July 1, 2024, requesting records under the Public Records Act. (Gov. Code, § 7920.000 et seq.) Specifically, you requested the following:

- 1. Any and all writings, as that term is defined in Evidence Code 250, that constitute, refer or relate to JIRA files on the following topics:*
  - a. Any enhancement to the Dealer Record of Sale Entry System (DES) to add a field for firearms that are neither rifles, shotguns, nor handguns.*
  - b. Any enhancement to the Dealer Record of Sale Entry System (DES) to add a field for longguns that are neither rifles, shotguns, nor handguns.*
  - c. Any enhancement to the Dealer Record of Sale Entry System (DES) to add a field defined as "others".*
- 2. Any and all writings, as that term is defined in Evidence Code 250, that constitute, refer or relate to notices to licensed California dealers about changes in the Dealer Record of Sale Entry System (DES) for:*
  - a. Firearms that are neither rifles, shotguns, nor handguns*
  - b. Firearms that are neither rifles, shotguns, nor handguns.*

*c. Firearms that constitute an "other" type firearm.*

*3. Any and all writings, as that term is defined in Evidence Code 250, that constitute, refer or relate to notices to law enforcement about:*

*a. Firearms that are neither rifles, shotguns, nor handguns*

*b. Firearms that are neither rifles, shotguns, nor handguns.*

*c. Firearms that constitute an "other" type firearm.*

*4. Any and all writings, as that term is defined in Evidence Code 250, that constitute, refer or relate to a copy of the Dealer Record of Sale Entry System JIRA Log.*

*All four of these requests are limited to those responsive writings, as that term is defined in Evidence Code 250, from October 1, 2019 through December 31, 2020.*

On August 16, 2024, the Department provided you a first installment of responsive records. With this letter, we are providing you with a second and final installment. The enclosed record has been redacted of information that is exempt through provisions of law that are expressly incorporated into the PRA. (Gov. Code, § 7927.705.)

The attorney work product exception protects the confidentiality of any writing that reflects an attorney's impressions, conclusions, opinions, legal research or legal theories that are maintained as confidential. (Code Civ. Proc., § 2018.030.) This confidentiality provision is incorporated into the PRA as an exemption from disclosure. (Gov. Code, § 7927.705; *County of Los Angeles v. Superior Court* (2000) 82 Cal.App.4th 819, 833.) Specifically, information that would disclose time and resources dedicated to active litigation is protected attorney work product that was redacted from the attached record. (*Los Angeles County Board of Supervisors v. Superior Court* (2016) 2 Cal.5th, 282, 297.)

Information that identifies specific firearms dealers has also been redacted. The Department keeps data regarding firearms sales and transfers as part of its general duty "to assist in the investigation of crime, the prosecution of civil actions by city attorneys . . . , the arrest and prosecution of criminals, and the recovery of lost, stolen, or found property." (Pen. Code, § 11106, subd. (a)(1).) California law limits with whom the Department can share much of this data to "officers referred to in [Penal Code section] 11105" and others for law



Jason Davis  
April 15, 2025  
Page 3

enforcement purposes as well as to researchers as detailed in Penal Code section 11106, subdivision (d.) By mandating disclosure under these specific circumstances, the Legislature has confirmed that the information maintained by the Department is confidential and not subject to disclosure to the public through the Public Records Act.

This completes our response to your request.

Sincerely,

A handwritten signature in black ink that reads "Sidney Villareal". The script is cursive and fluid.

SIDNEY VILLAREAL, Staff Services Manager I  
Bureau of Firearms

For ROB BONTA  
Attorney General

Attachment

# **EXHIBIT B**

Jira

Project: DROS Entry System




































































Created After: 1/Oct/19

Created Before: 31/Dec/20

Sorted by: Created ascending, then Priority descending, then Updated descending

1-104 of 104 as at: 12/Feb/25 2:23 PM

T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1538	Ammo - DES Eligibility Check Definitions	Unassigned	Jessyca Crews (Inactive)		CLOSED		Reviewed and Cancelled	01/Oct/19	26/Jan/23			None
	DES-1539	AMMO - DES User Enrollment Report	Mike Titlow	Mike Titlow		CLOSED		Fixed	03/Oct/19	30/Jun/20			None
	DES-1540	Requesting report	Mike Titlow	Maricela Leyva		CLOSED		Fixed	03/Oct/19	28/Apr/20			None
	DES-1541	DES-1537 / Update the Existing cleanup job that runs at 1 AM.	Mike Titlow	Oleg Khabatyuk		CLOSED		Fixed	04/Oct/19	18/Dec/19			None
	DES-1542	DES-1537 / Create a new job that clears out records that are stuck in the cart more frequently.	Mike Titlow	Oleg Khabatyuk		CLOSED		Fixed	04/Oct/19	18/Dec/19			None
	DES-1543	CFD: [REDACTED] Can't create a DES account	Mike Titlow	Stephanie Brooks (Inactive)		CLOSED		Fixed	07/Oct/19	27/Aug/21			None
	DES-1544	Update status to records that were not deleted from the system completely	Mike Titlow	Maricela Leyva		CLOSED		Fixed	08/Oct/19	28/Apr/20			None
	DES-1545	Ammo Stat Request - [REDACTED]	Brandon Hamahashi	Mayra Morales		CLOSED		Done	13/Oct/19	07/Nov/19			None
	DES-1546	AmmoRPT01 - Ammo Daily Executive Report Spec Issue	Philip Choi	Ansu Suseelan (Inactive)		CLOSED		Fixed	14/Oct/19	16/Dec/19	Documentation		None
	DES-1547	AmmoRPT01 - Daily Executive Report Spec	Philip Choi	Ansu Suseelan (Inactive)		CLOSED		Fixed	14/Oct/19	16/Dec/19	Documentation		None
	DES-1548	JBoss EAP 6.4 to 7.2	Mike Titlow	Jessyca Crews (Inactive)		CLOSED		Fixed	15/Oct/19	07/Jan/20			None
	DES-1549	BAEC and SAEC Prohibited Persons Listing	Brandon Hamahashi	Mayra Morales		CLOSED		Done	18/Oct/19	18/Oct/19			None
	DES-1550	CFD: [REDACTED] delayed/pending dros date and time	Mike Titlow	Stephanie Brooks (Inactive)		CLOSED		Functions As Designed	21/Oct/19	27/Aug/21			None
	DES-1551	AMMORPT01 - Mismatch in requirements for line 44 and 46	Jessyca Crews (Inactive)	Ansu Suseelan (Inactive)		CLOSED		Fixed	22/Oct/19	11/Dec/19	Documentation		None
	DES-1552	Emergency Core and Leaf Switch Reload	Mike Titlow	Mike Titlow		CLOSED		Fixed	23/Oct/19	23/Oct/19			None





















T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1553	Admin is unable to login during maintenance hours.	Unassigned	Anoop Sugunan (Inactive) 		CLOSED		Unresolved	23/Oct/19	23/Oct/19			None
	DES-1554	Error message is not getting cleared when logging in during Maintenance Hours	Unassigned	Anoop Sugunan (Inactive) 		CLOSED		Unresolved	23/Oct/19	25/Nov/19			None
	DES-1555	CFD: [REDACTED], Can't reset password to pay DES Past Due Invoices	Stephanie Brooks (Inactive) 	Stephanie Brooks (Inactive) 		CLOSED		Functions As Designed	23/Oct/19	27/Aug/21			None
	DES-1556	DROS Fee Adjustment pursuant to AB 1669	John Feng 	Elene McGee (Inactive) 		CLOSED		Fixed	29/Oct/19	14/Feb/20			None
	DES-1557	ammo: daylight saving issue because DES is now up at night	Unassigned	Koy Saefong 		OPEN		Unresolved	01/Nov/19	06/Mar/23			None
	DES-1558	Ammo - DES - Contab file referring to wrong file name for DES Invoice job	Terence Pan (Inactive) 	Jyoji Borra (Inactive) 		CLOSED		Fixed	01/Nov/19	07/Jul/20			None
	DES-1559	Opera cached credentials	Mike Titlow 	Mike Titlow 		CLOSED		Fixed	07/Nov/19	16/Jun/22			None
	DES-1560	CFD: [REDACTED] DROS Corrections Needed	Oleg Khabatyuk 	Stephanie Brooks (Inactive) 		CLOSED		Done	11/Nov/19	27/Aug/21			None
	DES-1561	CFD: [REDACTED] Invoice 8/1/19 - 8/31/19 Over Billed	Oleg Khabatyuk 	Erica Heikila (Inactive) 		CLOSED		Done	13/Nov/19	20/Apr/20			None
	DES-1562	AmmoRPT01 - Ammo Daily Executive Report Spec Font Issue	Jessyca Crews (Inactive) 	Ansu Suseelan (Inactive) 		CLOSED		Fixed	14/Nov/19	12/Aug/20	Documentation		None
	DES-1563	DES-1556 / Zero Trim	Jeffrey Liu 	Mike Titlow 		CLOSED		Fixed	21/Nov/19	14/Feb/20			None
	DES-1564	CFD: [REDACTED] - FTPI Error Message	Mike Titlow 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	03/Dec/19	27/Aug/21			None
	DES-1565	Pay Invoices screen does not allow partial payment in current month first line	Terence Pan (Inactive) 	Terence Pan (Inactive) 		CLOSED		Fixed	09/Dec/19	01/Feb/23			None
	DES-1566	DES-1475 / "Cost" column be converted to a currency format (\$0.00)	Unassigned	Erica Brown 		OPEN		Unresolved	15/Dec/19	07/Dec/21			None
	DES-1567	AMMO - AmmoRPT01-Daily and Monthly Executive Report for AMMO	Brandon Hamahashi 	Jessyca Crews (Inactive) 		CLOSED		Done	16/Dec/19	10/Aug/20			None
	DES-1568	DES-1567 / AMMO - AmmoRPT01 - Monthly report needs various formatting corrections	Dennis Mustard 	Philip Choi 		CLOSED		Fixed	16/Dec/19	19/Jan/23			None
	DES-1569	Information request regarding Under 21 transfers	Mike Titlow 	Maricela Leyva 		CLOSED		Fixed	16/Dec/19	21/Jun/23			None
	DES-1570	DES History tables has different column length than DES tables	Edmond Ho 	John Feng 		CLOSED		Fixed	17/Dec/19	21/Oct/22	Database		None






T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1571	COE Wrong ID Number Application Error	Terence Pan (Inactive)	Mike Titlow		CLOSED		Fixed	17/Dec/19	20/Jan/23			None
	DES-1572	Ammo Stat Request -	Brandon Hamahashi	Mayra Morales		CLOSED		Done	19/Dec/19	28/May/20			None
	DES-1573	Ammunition - Private Party Transactions - Statistical Request	Brandon Hamahashi	Mayra Morales		CLOSED		Done	20/Dec/19	28/May/20			None
	DES-1574	Remove Reference to Handgun Safety Certificate (HSC) in DES	Unassigned	Erica Brown		OPEN		Unresolved	27/Dec/19	07/Dec/21			None
	DES-1575	Statistical Request - #19-146LE (Stats on Lower Receivers)	Brandon Hamahashi	Brandon Hamahashi		CLOSED		Done	09/Jan/20	09/Jan/20			None
	DES-1576	Transaction Fee for the additional Firearm	Mike Titlow	Mike Titlow		CLOSED		Fixed	13/Jan/20	19/Jan/23			None
	DES-1577	Add "Other" under Gun Type for All Long Gun Transactions	Terence Pan (Inactive)	Maricela Leyva		CLOSED		Fixed	23/Jan/20	19/Jan/23			None
	DES-1578	Need Verification that CFD:  read two DES bulletins.	Stephanie Brooks (Inactive)	Stephanie Brooks (Inactive)		CLOSED		Fixed	31/Jan/20	27/Aug/21			None
	DES-1579	Ammo Stat Request -	Brandon Hamahashi	Mayra Morales		CLOSED		Done	04/Feb/20	26/May/20			None
	DES-1580	DES-1577 / CFIS change backend code to accommodate Other gun type 'Z'	Terence Pan (Inactive)	Terence Pan (Inactive)		CLOSED		Fixed	06/Feb/20	19/Jan/23			None
	DES-1581	Gun Error Report Correction	Byounghyun An	Byounghyun An		CLOSED		Fixed	06/Feb/20	06/Feb/20			None
	DES-1582	Dealer Monthly Invoice PDF report	Maricela Leyva	Mike Titlow		CLOSED		Fixed	06/Feb/20	19/Jan/23			None
	DES-1583	Ammo Stat Request	Brandon Hamahashi	Mayra Morales		CLOSED		Done	14/Feb/20	14/Apr/20			None
	DES-1584	CFD , Requesting monthly firearm dealer invoices	Stephanie Brooks (Inactive)	Stephanie Brooks (Inactive)		CLOSED		Done	19/Feb/20	27/Aug/21			None
	DES-1585	Gun Type 'Other' UAT	Mike Titlow	Christina RosaRobinson		CLOSED		Fixed	24/Feb/20	15/Aug/22			None
	DES-1586	Ammo Stat Request	Brandon Hamahashi	Mayra Morales		CLOSED		Fixed	02/Mar/20	04/Jan/22			None
	DES-1587	DES- Ammo Invoice Summary Schedule	Mike Titlow	Mike Titlow		CLOSED		Fixed	02/Mar/20	01/Jun/20			None

T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1588	DES Flash Message Phone Line Down	Maricela Leyva 	Maricela Leyva 		CLOSED		Fixed	04/Mar/20	04/Mar/20			None
	DES-1589	DES Flash Message Daylight Savings Spring Forward	Unassigned	Maricela Leyva 		CLOSED		Done	04/Mar/20	02/Jun/22			None
	DES-1590	Country of Citizen drop down collects data when the answer is Yes	Unassigned	Oleg Khabatyuk 		CLOSED		Fixed	06/Mar/20	20/Jan/23			None
	DES-1591	DROS Report Missing Seller PII/Firearm Color	Unassigned	Erica Brown 		CLOSED		Fixed	09/Mar/20	31/Oct/23			None
	DES-1592	Flash Message - During COVID-19	Cheryle Massaro 	Cheryle Massaro 		CLOSED		Fixed	23/Mar/20	23/Mar/20			None
	DES-1593	Required Field for Purchaser's Telephone #/ Occupation	Unassigned	Erica Brown 		OPEN		Unresolved	03/Apr/20	16/Jan/25			None
	DES-1594	Post Flash message on DES	Oleg Khabatyuk 	Oleg Khabatyuk 		CLOSED		Fixed	06/Apr/20	12/May/20			None
	DES-1595	Delivery Date and Time Extended after Day 10 Approval	Terence Pan (Inactive) 	Erica Heikila (Inactive) 		CLOSED		Fixed	09/Apr/20	19/Jan/23			None
	DES-1596	Added FR167 to SRS	Mike Titlow 	Mike Titlow 		CLOSED		Fixed	10/Apr/20	10/Apr/20			None
	DES-1597	DES Flash Message	Brandon Hamahashi 	Brandon Hamahashi 		CLOSED		Done	25/Apr/20	25/Apr/20			None
	DES-1598	CLONE - DROS Backend - Combine DROS background checks from a single transaction so they can be processed by one analyst	Unassigned	Mike Titlow 		CLOSED		Fixed	29/Apr/20	29/Apr/20			None
	DES-1599	some DES cancel not pull in to DROS	Unassigned	Koy Saefong 		OPEN		Unresolved	07/May/20	07/May/20			None
	DES-1600	Undeliverable Firearms -JES- (distribution list )	Nikitha Raju 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	07/May/20	31/Oct/23			None
	DES-1601	Deliver Gun/Review DROS Page is Blank after trying to Search Purchasers	Cheryle Massaro 	Erica Brown 		CLOSED		User Cancelled	03/Jun/20	02/Jun/22			None
	DES-1602	Firefox 77.0.1 - Browser Caching Issue	Unassigned	Cheryle Massaro 		OPEN		Unresolved	09/Jun/20	09/Jun/20			None
	DES-1603	CLONE - Firefox 77.0.1 - Browser Caching Issue	Unassigned	Cheryle Massaro 		CLOSED		Duplicate	09/Jun/20	09/Jun/20			None
	DES-1604	DROS Research Request	Gautham Mulakala 	Gautham Mulakala 		CLOSED		Fixed	10/Jun/20	31/Oct/23			None
	DES-1605	CFD [REDACTED], Autohaus Firearms	Cheryle Massaro 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	18/Jun/20	27/Aug/21			None
	DES-1606	Re-enroll All [REDACTED] Employees under Main COE [REDACTED]	Unassigned	Erica Brown 		CLOSED		User Cancelled	25/Jun/20	02/Jun/22			None



T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1607	ATF Request for Name of DES User who submitted transactions at CFD: [REDACTED]	Cheryle Massaro 	Erica Heikila (Inactive) 		CLOSED		Fixed	25/Jun/20	02/Jul/20			None
	DES-1608	Flash Message Holiday/CSC Availability	Oleg Khabatyuk 	Erica Heikila (Inactive) 		CLOSED		Fixed	25/Jun/20	26/Jun/20			None
	DES-1609	CSC New Hours of Operation Flash Message	Cheryle Massaro 	Maricela Leyva 		CLOSED		Fixed	03/Jul/20	12/Aug/20			None
	DES-1610	DES Payment Details & Invoice Summary Repot posted Declined Transactions as Paid	Mike Titlow 	Erica Heikila (Inactive) 		CLOSED		Functions As Designed	08/Jul/20	14/Jul/20			None
	DES-1611	DES Resuming Phone Calls Flash Message	Cheryle Massaro 	Maricela Leyva 		CLOSED		Fixed	07/Aug/20	12/Aug/20			None
	DES-1612	PPT PII Changed after Submission in DES but the Correct PII was Transferred to DROS	Mike Titlow 	Erica Brown 		CLOSED		Fixed	13/Aug/20	16/Jun/22			None
	DES-1613	Dealer Read Receipt for DES Bulletin #58	Cheryle Massaro 	Maricela Leyva 		CLOSED		Fixed	13/Aug/20	25/Aug/20			None
	DES-1614	DES/CFARS Place of Birth Drop Down Update	Edmond Ho 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	19/Aug/20	02/Sep/22			<span>fill</span>
	DES-1615	Dealer Ammo Submission Request	Unassigned	Maricela Leyva 		CLOSED		Fixed	21/Aug/20	17/Oct/23			None
	DES-1616	CFD [REDACTED] Couldn't add firearms to the pending purchases	Cheryle Massaro 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	26/Aug/20	27/Aug/21			None
	DES-1617	DES System Generated Username Does Not Fit in Username Field	Cheryle Massaro 	Stephanie Brooks (Inactive) 		CLOSED		Fixed	02/Sep/20	27/Aug/21			None
	DES-1618	SB 1100 Related Issues	Nathan Lubeck 	Nathan Lubeck 		CLOSED		Unresolved	22/Sep/20	21/Sep/22			<span>Ammo-Phase-II</span>
	DES-1619	SB 61 Related Issues	Nathan Lubeck 	Nathan Lubeck 		CLOSED		Unresolved	22/Sep/20	21/Sep/22			<span>Ammo-Phase-II</span>
	DES-1620	Full name is longer than 30 characters	Cheryle Massaro 	Koy Saefong 		CLOSED		User Cancelled	30/Sep/20	16/Oct/23			None
	DES-1621	DES, AFS, DROS have different model name	Erica Brown 	Erica Brown 		CLOSED		Cannot Reproduce	12/Oct/20	23/Jan/23			None
	DES-1622	DES migration to DROS changed purchaser name to alias	Mike Titlow 	Erica Brown 		CLOSED		Functions As Designed	12/Oct/20	29/Aug/22			None
	DES-1623	[Dupe] SB 61 - Old FR 7	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	13/Oct/20	21/Apr/23			<span>Ammo-Phase-II</span>
	DES-1624	[Dupe] SB 61 - Old FR 8	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	13/Oct/20	21/Apr/23			<span>Ammo-Phase-II</span>
	DES-1625	[Dupe] SB 61 - Old FR 9	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	13/Oct/20	21/Apr/23			<span>Ammo-Phase-II</span>

T	Key	Summary	Assignee	Reporter	P	Status	MKE	Resolution	Created	Updated	Defect Type	Development	Labels
	DES-1626	[Dupe] SB 61 - Old FR 10	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1627	[Dupe] SB 61 - Old FR 11	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1628	[Dupe] SB 61 - Old FR 12	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1629	[Dupe] SB 61 - Old FR 13	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1630	[Dupe] SB 61 - Old FR 14	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1631	[Dupe] SB 61 - Old FR 15	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1632	[Dupe] SB 61 - Old FR 16	Unassigned	Jessyca Crews (Inactive) 		CLOSED		Duplicate	15/Oct/20	21/Apr/23			Ammo-Phase-II
	DES-1633	Ammo Stats Request - 	Brandon Hamahashi 	Mayra Morales 		CLOSED		Done	15/Oct/20	07/May/24			None
	DES-1634	Data Request for 	Mike Titlow 	Mike Titlow 		CLOSED		Fixed	19/Oct/20	30/Jun/23			None
	DES-1635	Daylight Savings Flash Message	Jennifer Le 	Maricela Leyva 		CLOSED		Done	19/Oct/20	02/Jun/22			None
	DES-1636	 DROS transactions	Unassigned	Maricela Leyva 		CLOSED		Done	19/Oct/20	06/Oct/22			None
	DES-1637	CFD  Double Charged for two Separate Purchasers	Cheryle Massaro 	Erica Heikila (Inactive) 		CLOSED		Fixed	21/Oct/20	09/Nov/20			None
	DES-1638	DES 11/1/2020 Invoice was not billed	Cheryle Massaro 	Erica Heikila (Inactive) 		CLOSED		Fixed	02/Nov/20	02/Nov/20			None
	DES-1639	DES/FCS Holiday Flash Message	Oleg Khabatyuk 	Erica Heikila (Inactive) 		CLOSED		Fixed	12/Nov/20	02/Dec/20			None
	DES-1640	Flash Message Holiday Hours	Oleg Khabatyuk 	Maricela Leyva 		CLOSED		Fixed	12/Nov/20	02/Jun/22			None
	DES-1641	Update Undelivered DROS Information	Stephanie Brooks (Inactive) 	Erica Brown 		CLOSED		Fixed	20/Nov/20	19/Jan/23			None



## PROOF OF SERVICE

Case Name: *Franklin Armory, Inc., et al. v. California  
Department of Justice, et al.*  
Court of Appeal Case No. B340913  
Superior Court Case No. 20STCP01747

I, Laura Fera, 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, Long Beach, California 90802.


On May 21, 2025, I served a copy of the foregoing document described as: **DECLARATION OF JASON A. DAVIS IN SUPPORT OF APPELLANTS' REQUEST FOR JUDICIAL NOTICE, OR ALTERNATIVELY, MOTION TO TAKE EVIDENCE [California Rules of Court, rules 8.252(a), 8.252(c)]**, on the following parties, as follows:

Kenneth G. Lake  
[Kenneth.Lake@doj.ca.gov](mailto:Kenneth.Lake@doj.ca.gov)  
Andrew F. Adams  
[Andrew.Adams@doj.ca.gov](mailto:Andrew.Adams@doj.ca.gov)  
Office of the Attorney General  
300 South Spring Street  
Los Angeles, CA 90013

*Attorneys for Respondent*

These parties were served as follows: I served a true and correct copy by electronic transmission through TrueFiling. 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 May 21, 2025, at Long Beach, California.



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Laura Fera  
Declarant