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*EXEMPT FROM FILING FEES
PURSUANT TO GOV. CODE § 6103*

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 **SAFARI CLUB INTERNATIONAL;
13 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
14 CALIFORNIA BOWMEN
HUNTERS/STATE ARCHERY
15 ASSOCIATION; HOWL FOR WILDLIFE,
INC.; CALIFORNIA DEER
16 ASSOCIATION; and COALITION TO
SAVE CATALINA ISLAND DEER,**

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Petitioners,

v.

**CALIFORNIA DEPARTMENT OF FISH
AND WILDLIFE; and DOES 1-10,**

Respondents,

CATALINA ISLAND CONSERVANCY,

Real Party in Interest.

Case No. 26STCP00987

**RESPONDENT'S EVIDENTIARY
OBJECTIONS TO PETITIONERS'
DECLARATION OF TIFFANY D.
CHEUVRONT IN SUPPORT OF
PETITIONERS' MOTION TO
CONFORM**

Date: June 11, 2026
Time: 1:30 p.m.
Dept: 86
Judge: Honorable Curtis A. Kin
Action Filed: March 10, 2026

1 **INTRODUCTORY STATEMENT**

2 Respondent California Department of Fish and Wildlife (Department or Respondent)
3 hereby submit its evidentiary objections to Petitioners Safari Club International, et al.’s
4 (Petitioners) Declaration of Tiffany D. Chevront in Support of Petitioners’ Motion to Conform
5 (Chevront Declaration). Respondent respectfully requests the Court rule on its objections prior
6 to considering the evidence submitted by Petitioners via the Chevront Declaration in connection
7 with the Motion.

8 Any evidence submitted by a party in a declaration must meet all statutory requirements for
9 evidence at trial. (*Pajaro Valley Water Mgmt. Agency v. McGrath* (2005) 128 Cal.App.4th 1093,
10 1107.) This means that to be admissible, declarations must be from competent witnesses, having
11 personal knowledge of the facts, rather than hearsay or conclusions. (*Ibid.*)

12 **SUMMARY OF MATERIAL OFFERED AND OBJECTIONS**

13 **A. Declaration of Tiffany D. Chevront**

Objection No.	Evidence	Objections
1	Entirety of Exhibit E “One Legal Statement of Fact”	The objectionable document: (1) lacks authentication. (Evid. Code, § 1401.) (2) is hearsay not within any exception. (Evid. Code, § 1200.) (3) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)
2	“The One Legal Statement of Fact shows that, on March 9, 2026, at approximately 11:17 PM, Ms. Villegas logged into the One Legal system and initiated a case filing transaction. Based on discussions with Ms. Villegas and my review of her ActivTrak® activity logs and the One Legal Statement of Fact, I understand that this included entering all case-initiating information, including the required case and party information, into the system.” (Chevront Decl., ¶ 7.)	The objectionable statement: (1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.) (2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)

Objection No.	Evidence	Objections
3	<p>“The One Legal Statement of Fact shows that, at approximately 11:32 PM, Ms. Villegas began uploading documents to the filing transaction. Both Ms. Villegas’ ActivTrak® activity log and my conversations with Ms. Villegas confirm that, at this time, Ms. Villegas was attempting to upload the Verified Petition and attached exhibits.”</p> <p>(Cheuvront Decl., ¶ 8.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
4	<p>“The One Legal Statement of Fact shows a period of no user activity for Ms. Villegas between 11:32:47 AM and 11:49:00 AM, immediately before the system stopped the upload without warning and navigated Ms. Villegas back to the One Legal homepage without saving any of her previous work. The Statement does not further explain what is meant by “no user activity.” But from my discussions with Ms. Villegas, I understand that after initiating the upload of the document, she remained engaged in the filing process while she waited for the system to complete the upload. Ms. Villegas indicated that the system looked like it was moving slow and taking a while to upload. She was at her computer terminal during this time.”</p> <p>(Cheuvront Decl., ¶ 9.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>

Objection No.	Evidence	Objections
5	<p>“The One Legal Statement of Facts shows that, at approximately 11:49 PM, ‘system records indicate navigation back to the One Legal homepage.’ The Statement does not further explain what is meant by ‘navigation back to the One Legal homepage.’ Ms. Villegas, however, explained in her March 18, 2026 declaration and in conversations with me that, while still in the process of uploading the Verified Petition and exhibits, the One Legal system abruptly returned her to the homepage, terminating the filing session she had begun. She did not manually navigate back to the homepage.”</p> <p>(Cheuvront Decl., ¶ 10.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
6	<p>“When this occurred, the filing transaction was no longer active, and Ms. Villegas was unable to continue the filing from where she had left off. Nothing she had previously entered into the system had been saved, and no documents were successfully uploaded.”</p> <p>(Cheuvront Decl., ¶ 11.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
7	<p>“In my conversations with Ms. Villegas, she indicated that it took her by surprise and she searched the homepage that she was automatically directed to for a few minutes looking for the case information already entered, but it was not there.”</p> <p>(Cheuvront Decl., ¶ 12.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
8	<p>“The One Legal Statement of Fact shows that, at approximately 11:53 PM, Ms. Villegas initiated a new case initiation transaction. Because the original transaction had been terminated without saving case information, Ms. Villegas was required to re-enter all required case and party information. She completed that process at around 11:58 PM.”</p> <p>(Cheuvront Decl., ¶ 13.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>

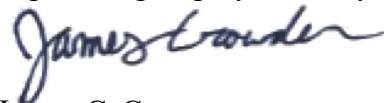
Objection No.	Evidence	Objections
9	<p>“The One Legal Statement of Fact shows that, at approximately 12:02 AM, Ms. Villegas added documents to the transaction for the second time. While the One Legal Statement of Fact does not describe the document Ms. Villegas uploaded, I understand from my discussions with her that it was the Verified Petition only, so she could get it on file as quickly as possible.”</p> <p>(Cheuvront Decl., ¶ 14.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
10	<p>“Ms. Villegas reported to me that, during the upload process, she did not receive an error message, warning, or other notification indicating that the document upload was taking too long to process or that the system would soon timeout, terminating the session.”</p> <p>(Cheuvront Decl., ¶ 16.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>
11	<p>“This tracks what I have come to learn about the One Legal eFiling system. On or about April 14, 2026, I sent an email to One Legal Customer Support, asking: ‘[W]hen the screen times out and returns to the home screen, does the system have any kind of warning message that tells the person the session is about to time out?’ ‘Carolyn Z,’ Client Experience Specialist, responded later that morning that ‘[t]here is no warning regarding a time-out.’ I then followed up with an email to ask whether there were ‘any plans to add a warning notice in One Legal before a time out.’ I also asked whether One Legal has an autosave feature because Ms. Villegas had lost all the information previously entered when the session terminated. ‘Carolyn Z’ said that my questions had been sent to the One Legal Production Support Team and that she was awaiting a response. A week went by, and I received no other response to my questions.”</p> <p>(Cheuvront Decl., ¶ 17.)</p>	<p>The objectionable statement:</p> <p>(1) lacks authentication (Evid. Code, § 1401.)</p> <p>(2) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(3) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p> <p>(4) is irrelevant. (Evid. Code, § 350.)</p>

Objection No.	Evidence	Objections
12	<p>“Because this indicated to me that One Legal has not implemented a likely industry standard regarding time-out warning to the user, I sent a follow-up email to One Legal on April 21, 2026, explaining that other eFiling systems have time-out warning notices and autosave features, and that we are interested to know whether One Legal has any plans to add these types of features like other systems. ‘Carolyn Z’ promptly responded that One Legal’s ‘Production Support Team is discussing the implementation of an eFiling status alert on the One Legal order platform warning of a time-out.’” (Cheuvront Decl., ¶ 19.)</p>	<p>The objectionable statement:</p> <p>(1) lacks authentication. (Evid. Code, § 1401.)</p> <p>(2) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(3) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p> <p>(4) is irrelevant. (Evid. Code, § 350.)</p>
13	<p>“Ms. Villegas also reported that the system never indicated that the documents were too large, that the filing was noncompliant in any way, or any other issue with the filing or the upload before the session abruptly terminated and navigated back to the One Legal homepage. That said, after removing the attached exhibits from the file, the successful upload indicates that the original file’s size may have caused the unsuccessful upload and the unannounced session timeout.” (Cheuvront Decl., ¶ 20.)</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>

Dated: May 27, 2026

Respectfully submitted,

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Department of Fish & Wildlife

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39868466

DECLARATION OF SERVICE BY E-MAIL

Case Name: Safari Club International, et al. v. California Department of Fish and Wildlife, et al.

Case No.: 26STCP00987

I declare:

I am at least 18 years of age and not a party to this matter. I am employed in the Office of the Attorney General of the State of California. My business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, County of Los Angeles. My electronic service address is beatriz.davalos@doj.ca.gov.

On May 27, 2026, I electronically served the **RESPONDENT'S EVIDENTIARY OBJECTIONS TO PETITIONERS' DECLARATION OF TIFFANY D. CHEUVRONT IN SUPPORT OF PETITIONERS' MOTION TO CONFORM** by emailing it to the following individuals:

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*Attorneys for Real Party in Interest
Catalina Island Conservancy*

*Attorneys for Petitioners
Safari Club International, et al.*

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on May 27, 2026.

Beatriz Davalos

Declarant



Signature