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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By A. Lopez, Deputy Clerk

6 Attorneys for Petitioners Safari Club International;
California Rifle & Pistol Association, Incorporated;
7 California Bowmen Hunters/State Archery Association;
HOWL for Wildlife, Inc.; California Deer Association;
8 and Coalition to Save Catalina Island Deer

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

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

16 Plaintiffs-Petitioners,

17 v.

18 CALIFORNIA DEPARTMENT OF FISH
AND WILDLIFE; et al.,

19 Defendants-Respondents.
20

Case No.: 26STCP00987

**RESPONSE TO RESPONDENT CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE'S
EVIDENTIARY OBJECTIONS TO
DECLARATION OF TIFFANY D. CHEUVRONT
IN SUPPORT OF PETITIONERS' MOTION TO
CONFORM**

Hearing Date: June 11, 2026

Hearing Time: 1:30 PM

Department: 86

Judge: Hon. Curtis A. Kin

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23 Petitioners Safari Club International, California Rifle & Pistol Association, Incorporated,
24 California Bowmen Hunters/State Archery Association, HOWL for Wildlife, Inc., California Deer
25 Association, and Coalition to Save Catalina Island Deer submit the following response to Respondent
26 California Department of Fish and Wildlife's Evidentiary Objections to Declaration of Tiffany D.
27 Chevront in Support of Petitioners' Motion to Conform.

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No.	Evidence	Objections	Petitioners' Response
1	<p data-bbox="310 258 581 289">Entirety of Exhibit E</p> <p data-bbox="310 321 634 384">“One Legal Statement of Fact”</p>	<p data-bbox="721 258 1094 289">The objectionable document:</p> <p data-bbox="721 321 1029 384">(1) lacks authentication. (Evid. Code, § 1401.)</p> <p data-bbox="721 415 1084 510">(2) is hearsay not within any exception. (Evid. Code, § 1200.)</p> <p data-bbox="721 541 1078 667">(3) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>	<p data-bbox="1130 258 1503 888">The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness (Evid. Code § 1271)</p> <p data-bbox="1130 919 1487 951">Proposed ruling: Overruled.</p>
2	<p data-bbox="310 993 691 1528">“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.”</p> <p data-bbox="310 1560 605 1591">(Cheuvront Decl., ¶ 7.)</p>	<p data-bbox="721 993 1094 1024">The objectionable statement:</p> <p data-bbox="721 1056 1078 1171">(1) contains and relies upon hearsay not within any exception. (Evid. Code, § 1200.)</p> <p data-bbox="721 1203 1078 1339">(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>	<p data-bbox="1130 993 1503 1623">The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness. (Evid. Code § 1271).</p> <p data-bbox="1130 1654 1503 1780">Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶8). (Evid. Code, 702.)</p> <p data-bbox="1130 1812 1487 1938">Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3,4). (Evid. Code, 702.)</p>

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			<p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of the electronic records goes to weight, not admissibility.</p> <p>Proposed ruling: Overruled.</p>
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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶8). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3-5). (Evid. Code,702.)</p> <p>The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness. (Evid. Code § 1271).</p> <p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of</p>

			<p>the electronic records goes to weight, not admissibility.</p> <p>Proposed ruling: Overruled.</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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶¶8-10). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3,4). (Evid. Code,702.)</p> <p>The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness. (Evid. Code § 1271).</p> <p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of the electronic records goes to weight, not admissibility.</p> <p>Proposed ruling: Overruled.</p>
5	<p>“The One Legal Statement of Facts shows that, at approximately 11:49 PM, ‘system records indicate navigation back to the One</p>	<p>The objectionable statement:</p> <p>(1) contains and relies upon hearsay not within any</p>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶8). (Evid. Code,702.)</p>

<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20</p>	<p>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>exception. (Evid. Code, § 1200.)</p> <p>(2) lacks foundation and indicia of personal knowledge. (Evid. Code, §§ 403, 702.)</p>	<p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3,4). (Evid. Code,702.)</p> <p>The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness. (Evid. Code § 1271).</p> <p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of the electronic records goes to weight, not admissibility.</p> <p>Proposed ruling: Overruled.</p>
<p>21 22 23 24 25 26 27 28</p>	<p>6 “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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶¶9-10). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶ 3). (Evid. Code,702.)</p> <p>Because the same facts are established through competent testimony from the percipient witness, any foundation objection is</p>

			<p>unfounded and any hearsay objection goes to weight rather than admissibility. (Evid. Code,702.)</p> <p>Proposed ruling: Overruled.</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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶10). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶3). (Evid. Code,702.)</p> <p>Because the challenged statements are established through competent testimony from the percipient witness, any foundation objection is unfounded and any hearsay objection goes to weight rather than admissibility. (Evid. Code,702.)</p> <p>Proposed ruling: Overruled.</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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶¶10-11). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3,4). (Evid. Code,702.)</p> <p>The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the</p>

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			<p>signature indicates trustworthiness. (Evid. Code § 1271).</p> <p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of the electronic records goes to weight, not admissibility.</p> <p>Proposed ruling: Overruled.</p>
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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶¶10-11). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶¶ 3,4). (Evid. Code,702.)</p> <p>The One Legal Statement of Fact is machine-generated output of One Legal's filing platform and is not a person's hearsay statement; it is also offered to show the sequence and operation of the system, not for the truth of any human assertion. It was directly emailed from One Legal with the person who ran the report as a signatory at the bottom of the report. The report is made in the regular course of business, at or near the time of the event, and the source with the signature indicates trustworthiness. (Evid. Code § 1271).</p> <p>Because the challenged statements are independently established through testimony of a percipient witness and regularly kept business records, there is no</p>

1			basis for exclusion on hearsay or foundation grounds. Any dispute regarding the significance of the electronic records goes to weight, not admissibility Proposed ruling: Overruled.
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5	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> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶ 3). (Evid. Code, 702.)</p> <p>Proposed ruling: Overruled.</p>
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11	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>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> <p>The statements are from Ms. Cheuvront’s personal knowledge and can be corroborated by the emails themselves, which can be produced if required. A representation in a sworn declaration that can be easily proven true or false is sufficiently trustworthy to fall outside of the hearsay restriction. (Evid. Code, 702.)</p> <p>Proposed ruling: Overruled.</p>
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	(Cheuvront Decl., ¶ 17.)		
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.’”</p> <p>(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>	<p>Petitioners withdraw Paragraph 19. The cited correspondence concerning prospective system changes is unnecessary to the motion. Proposed ruling: Sustained as withdrawn / moot.</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.”</p> <p>(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>	<p>Statements corroborated in Villegas Original Declaration (Villegas Decl., ¶8). (Evid. Code,702.)</p> <p>Cured by the Supplemental Declaration of Ms. Villegas (Villegas Supp. Decl., ¶ 3). (Evid. Code,702.)</p> <p>Because the same statements are established through competent testimony from the percipient witness, any foundation objection is unfounded and any hearsay objection goes to weight rather than admissibility. (Evid. Code,702.) .</p> <p>Proposed ruling: Overruled.</p>

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Dated: June 4, 2026

MICHEL & ASSOCIATES, P.C.



Sean A. Brady
Attorneys for Petitioners Safari Club International;
California Rifle & Pistol Association, Incorporated;
California Bowmen Hunters and State Archery
Association; HOWL for Wildlife, Inc.; California
Deer Association; and Coalition to Save Catalina
Island Deer

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

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, Suite 200, Long Beach, California 90802.

On June 4, 2026, I served the foregoing document(s) described as

**RESPONSE TO RESPONDENT CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE’S
EVIDENTIARY OBJECTIONS TO DECLARATION OF TIFFANY D. CHEUVRONT IN
SUPPORT OF PETITIONERS’ MOTION TO CONFORM**

on the interested parties in this action by placing

[] the original

[X] a true and correct copy

thereof by the following means, addressed as follows:

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Conservancy*

(BY MAIL) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit.

(BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic transmission pursuant to CCP 1010.6. 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 June 4, 2026, at Long Beach, California.



Laura Fera