

1 C. D. Michel - S.B.N. 144258  
Glenn S. McRoberts - S.B.N. 144852  
2 Clinton Monfort - S.B.N. 255609  
MICHEL & ASSOCIATES, LLP  
3 180 E. Ocean Boulevard, Suite 200  
Long Beach, CA 90802  
4 Telephone: 562-216-4444  
Facsimile: 562-216-4445  
5 Email: cmichel@michellawyers.com

6 Attorneys for Plaintiffs Jackson et. al.

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**IN THE UNITED STATES DISTRICT COURT**

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**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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**SAN FRANCISCO DIVISION**

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ESPANOLA JACKSON, PAUL COLVIN, ) CASE NO. C09-2143 RS

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THOMAS BOYER, LARRY BARSETTI, )

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DAVID GOLDEN, NOEMI MARGARET )

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ROBINSON, NATIONAL RIFLE )

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ASSOCIATION OF AMERICA, INC. SAN )

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FRANCISCO VETERAN POLICE )

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OFFICERS ASSOCIATION, )

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Plaintiffs )

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)

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vs. )

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CITY AND COUNTY OF SAN )

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FRANCISCO, MAYOR GAVIN )

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NEWSOM, in his official capacity; POLICE )

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CHIEF GEORGE GASCÓN, in his official )

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capacity, and Does 1-10, )

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Defendants. )

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**DECLARATION OF CLINTON B. MONFORT IN SUPPORT OF PLAINTIFFS' SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION TO DISMISS**

Hearing Date: April 28, 2011  
Time: 1:30 p.m.  
Place: Courtroom 3, 17th Fl.

Hon. Richard Seeborg

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DECLARATION OF CLINTON B. MONFORT

I, Clinton B. Monfort, declare as follows:

1. I am over the age of eighteen and not a party to this action. I am an attorney licensed to practice law before the United States District Court, Northern District of California. I am an associate attorney at the law firm Michel & Associates, P.C., attorneys of record for Plaintiffs in this action.

2. On or about April March 31, 2011, while reviewing Defendants' Reply in support of their Motion to Dismiss, our office learned that Defendants had amended their policies prohibiting the discharge of firearms within City and County limits.

3. On or about April 8, 2011, through April 13, 2011, our office engaged in an e-mail exchange with Defendants' counsel discussing the scope of Defendants' amendments to its firearms discharge policies. A true and accurate copy of the e-mail exchange between April 8, 2011, and April 13, 2011, is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 15, 2011.

/s/  
Clinton B. Monfort

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ESPANOLA JACKSON, PAUL COLVIN, ) **CASE NO.: CV-09-2143-PJH**  
THOMAS BOYER, LARRY BARSETTI, )  
DAVID GOLDEN, NOEMI MARGARET )  
ROBINSON, NATIONAL RIFLE )  
ASSOCIATION OF AMERICA, INC. SAN )  
FRANCISCO VETERAN POLICE )  
OFFICERS ASSOCIATION, )

Plaintiffs

vs.

CITY AND COUNTY OF SAN )  
FRANCISCO, MAYOR EDWIN LEE, in )  
his official capacity; ACTING POLICE )  
CHIEF JEFF GODOWN, in his official )  
capacity, and Does 1-10, )

Defendants.

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 E. Ocean Blvd., Suite 200, Long Beach, California, 90802.

I am not a party to the above-entitled action. I have caused service of:  
**DECLARATION OF CLINTON B. MONFORT IN SUPPORT OF PLAINTIFFS’  
SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION TO DISMISS**  
on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Wayne Snodgrass, Deputy City Attorney  
Sherri Sokeland Kaiser, Deputy City Attorney  
[sherri.kaiser@sfgov.org](mailto:sherri.kaiser@sfgov.org)  
City and County of San Francisco  
Office of the City Attorney  
City Hall 1 Drive Carlton B.  
San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 15, 2011.

\_\_\_\_\_/S/\_\_\_\_\_  
C. D. Michel  
Attorney for Plaintiffs