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9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 JEFF SILVERSTER, MICHAEL
14 POESCHL, BRANDON COMBS,
THE CALGUNS FOUNDATION,
15 INC., a non-profit organization,
and THE SECOND
16 AMENDMENT FOUNDATION,
INC., a non-profit organization,

17 Plaintiffs,

18 v.

19 KAMALA HARRIS, Attorney
General of California (in her
20 official capacity), and DOES 1 to
21 20.

Case No. 1:11-cv-02137-AWI-SKO

DECLARATION OF VICTOR OTTEN
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGEMENT

1 I, Victor Otten, declare as follows:

2 1. I have personal knowledge of the following facts, except where I have
3 just information and belief, as indicated, and, if called as a witness, I could and
4 would testify competently to the facts.

5 2. I am a partner with the law firm Otten & Joyce, attorneys of record for
6 Plaintiffs JEFF SILVERSTER, BRANDON COMBS, THE CALGUNS
7 FOUNDATION, INC., a non-profit organization, and THE SECOND
8 AMENDMENT FOUNDATION, INC., a non-profit organization. I make this
9 declaration of my personal knowledge and, if called as a witness, could testify
10 competently to each of the following facts.

11 3. On or about January 28, 2013, Plaintiffs prior attorney, Jason Davis,
12 served responses to Defendants first of interrogatories. Attached hereto as Exhibit
13 "A" is a true and correct copy of Brandon Combs responses to Defendants first set
14 of interrogatories. Attached hereto as Exhibit "B" is a true and correct copy of
15 Jeffrey Silvester's responses to Defendants first set of interrogatories.

16 4. In May 2013, Jonathan Eisenberg took the depositions of Gene
17 Hoffman, Brandon Combs, Jeff Silvester and Alan Gottlieb. A court reporter
18 transcribed what was said at the depositions and provided the parties with a
19 transcript. Attached hereto as Exhibit "C" is a true and correct copy of certain pages
20 of the transcript of the Hoffman deposition. Attached hereto as Exhibit "D" is a true
21 and correct copy of certain pages of the transcript of the Gottlieb deposition.

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct and that this declaration is executed
24 on October 14th 2013 in Torrance, California.

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DATED: October 14, 2013

OTTEN & JOYCE, LLP



Victor Otten, Esq.
Attorneys for Plaintiffs