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6	LOS ANGELES COUNTY SHERIFF'S DEPARTMENT		
7			
8	UNITED STATES DISTRICT COURT		
9	CENTRAL DISTRICT OF CALIFORNIA		
10			
11	ROBERT THOMSON,	CASE NO. CV 11-06154 SJO(JCx)	
12	Plaintiff,	(to be related to CV 10-08377 JAK (JEMx) and CV 11-08026 JHN(JCGx)	
13	V.	LASD REPLY TO PLAINTIFF'S	
14	TORRANCE POLICE DEPARTMENT and THE LOS ANGELES COUNTY	OPPOSITION TO RELATING CASES	
15	SHERIFF'S DEPARTMENT,	[Local Rule 83-1.3]	
16	Defendants.		
17			
18	Under Central District Local Rule 83.1.3, a case need not be pending for it to		
19	be related. The Rule only requires that the related action be "previously filed or		
20	currently pending in the Central District" and (a) arise from the same or closely		
21	related transaction, happening, or event; (b) call for determination of the same or		
22	substantially related or similar questions of law and fact; or (c) for other reasons		
23	would entail substantial duplication of labor if heard by different judges." (Central		
24	Dist. Local Rule 83.1.3.)		
25	Here, the cases of Jonathan Birdt v. Charlie Beck, et al., United States		
26	District Court Case No. CV 10-08377 JAK (JEMx), Robert Thomson v. Torrance		
27 28	HOA.855069.1	Reply to Opp to Notice of Related Cases CV 10-08377 JAK(JEMx) / CV 11-06154 SJO (JCx),	

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	II · · · · · · · · · · · · · · · · · ·		
1	Police Department, et al., United States District Court Case No. CV 11-06154 SJO		
2	(JCx), and Sigitas Raulinaitis, et al. v. Los Angeles County Sheriff's Department,		
3	United States District Court Case No. CV 11-08026 JHN(JCGx) all allege that the		
4	Los Angeles County Sheriff's Department's policy for the issuance of concealed		
5	weapons permits violates the Second Amendment. In light of the identical legal		
6	issues presented in these cases, Defendant LASD submits that litigating these cases		
7	separately will create a substantial duplication of labor if heard by different judges.		
8	Judge Kronstadt recently ruled on the very issues that are the subjects of the		
9	Thomson and Raulinaitis cases, and is already familiar with the law and the facts.		
10	Having two other judges become familiar with the issues will result in a substantial		
11	and expensive duplication of labor. Moreover, inconsistent rulings may result.		
12	Accordingly, these are Related Cases for the purposes of Local Rule 83.1.3.		
13	Additionally, while the parties have filed their respective motions for		
14	summary judgments, the matter has not been fully briefed. The hearing on the		
15	Thomson matter is presently set before Judge Otero on February 27, 2012. While		
16	Plaintiff has filed his Oppositions to the Defendants' summary judgment motions,		
17	Defendants have not yet filed their papers. There is no trial date on the <i>Thomson</i>		
18	case. The trial date in <i>Raulinaitis</i> is September 4, 2012.		
19	DATED: January 20, 2012	Respectfully submitted,	
20		ANDREA SHERIDAN ORDIN	
21		County Counsel	
22		By /S/	
23		JENNIFER A.D. LEHMAN	
24	·	Principal Deputy County Counsel	
25	15	Attorneys for Defendant  LOS ANGELES COUNTY SHERIFF'S	
26	11	DEPARTMENT	
27	HOA.855069.1	Reply to Opp to Notice of Related Cases	
28		CV 10-08377 JAK(JEMx) / CV 11-06154 SJO (JCx),	
		CV 11-00134 B3O (3CX); CV 11-08026 JHN(JCGx	

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