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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TRACY RIFLE AND PISTOL LLC;
MICHAEL BARYLA; TEN PERCENT
FIREARMS; WESLEY MORRIS;
SACRAMENTO BLACK RIFLE, INC.;
ROBERT ADAMS; PRK ARMS, INC.; and
JEFFREY MULLEN,

Plaintiffs,

v.

KAMALA D. HARRIS, in her official capacity
as Attorney General of California; and
STEPHEN J. LINDLEY, in his official capacity
as Chief of the California Department of Justice
Bureau of Firearms,

Defendants.

Case No.: 2:14-cv-02626-TLN-DAD

**DECLARATION OF ROBERT ADAMS IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: January 29, 2015
Hearing Time: 2:00 p.m.
Judge: Hon. Troy L. Nunley
Courtroom 2, 15th Floor
Action Filed: Nov. 10, 2014


1 I, Robert Adams, declare:

2 1. I have personal knowledge of the matters set forth in this declaration, and would be
3 able to testify competently to these facts if called as a witness.

4 2. I am the owner of Sacramento Black Rifle, a firearms dealership in Rocklin,
5 California. Sacramento Black Rifle is listed as a firearms dealer in the California Department of
6 Justice's Centralized List of Firearms Dealers, and I am an individual licensee associated with the
7 dealership.

8 3. Penal Code section-26820 hinders my business because we cannot advertise what
9 the dealership offers for sale on my windows or on banners or signage visible from outside on our
10 premises. Advertising is one of my largest monthly expenditures; as a firearms dealer that may
11 lawfully sell handguns, not being able to effectively communicate, on-site, the products we sell is
12 detrimental to my business. But for Section 26820, we would display truthful, nonmisleading
13 material advertising the sale of handguns at the dealership.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed November 13, 2014 in California.

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18 ROBERT ADAMS
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PROOF OF SERVICE
Case No. 2:14-cv-02626-TLN-DAD

The undersigned hereby certifies as follows:

I am an employee of the law firm of Benbrook Law Group, PC, 400 Capitol Mall, Suite 1610, Sacramento, California. I am over 18 years of age and am not a party to the within action.

On November 17, 2014 I served a true copy of the following document:

**DECLARATION OF ROBERT ADAMS IN SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

on the party(ies) in this action by placing a true copy thereof in a sealed envelope(s), addressed as follows:

Kamala D. Harris Attorney General of California 1300 I Street Sacramento, CA 95814	Stephen J. Lindley California Department of Justice Bureau of Firearms 1300 I Street Sacramento, CA 95814
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_____(BY OVERNIGHT DELIVERY) I placed each such sealed envelope, with delivery fees provided for, for collection and overnight delivery at Benbrook Law Group, PC, Sacramento, California following ordinary business practices. I am readily familiar with the practice of Benbrook Law Group, PC for collection and processing of correspondence for overnight delivery, said practice being that in the ordinary course of business, correspondence is deposited in the facility regularly maintained by the express services carrier the same day as it is placed for collection.

XX (BY MAIL) I placed such sealed envelope, with postage fully prepaid for first-class mail, for collection and mailing at Benbrook Law Group, PC, Sacramento, California following ordinary business practices. I am readily familiar with the practice of Benbrook Law Group, PC for collection and processing of correspondence, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.

_____(PERSONAL SERVICE) by sending a true copy thereof in an envelope addressed as indicated above, and by then sealing said envelope(s) and giving the same to a messenger for personal delivery.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Dated: November 17, 2014

/s/ Kelly McConnen
Kelly McConnen