

1 Ronda Baldwin-Kennedy, Esq. (SB #302813)
2 Jerome A Clay, Esq. (SBN#327175)
3 Law Office of Ronda Baldwin-Kennedy
4 5627 Kanan Rd. #614
5 Agoura Hills, CA 91301
6 Ph: (951) 268-8977
7 Fax: (702) 974-0147
8 Email: ronda@lorbk.com
9 Email: jclay7@sbcglobal.net

10 Attorney for: Plaintiff Donald McDougall

11 **UNITED STATES DISTRICT COURT FOR THE**
12 **CENTRAL DISTRICT OF CALIFORNIA-WESTERN DIVISION**

13 Donald McDougall an Individual;
14 Plaintiff,

CASE NO. 2:20 CV-02927 CBM (ASX)

15 v.

**PLAINTIFF’S EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER**

16 COUNTY OF VENTURA CALIFORNIA,
17 Does 1-20 and Does 1-20

18 Defendant.

19 Plaintiff Donald McDougall, by and through his attorney applies ex parte to the court
20 pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65-1 for a Temporary Restraining
21 Order enjoining County of Ventura, California (Defendant) from ordering gun stores closed until
22 the Plaintiff’s complaint filed March 28, 2020 can be heard.

23 Counsel for Plaintiff Donald McDougall has advised counsel for Defendant, County of
24 Ventura, California of the Date and Substance of this Application by Email on March 30, 2020.
25 Defendant’s counsel has not informed Plaintiff if Defendant will be filing an opposition.
26

1 This application is made on the grounds set forth in the accompanying Memorandum in
2 support, and the attached Exhibits thereto; all pleadings and papers filed in this action; the
3 argument of counsel; and further evidence as the Court may consider at or before a hearing
4 regarding this application.
5

6 Dated: March 30, 2020
7

8 /S/ Ronda Baldwin-Kennedy
9 Ronda Baldwin-Kennedy, Esq
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27