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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

16 LANA RAE RENNA, an individual;
17 DANIELLE JAYMES, an individual;
18 HANNAH SPOUSTA, an individual;
19 LAURA SCHWARTZ, an individual;
20 MICHAEL SCHWARTZ, an individual;
21 ROBERT MACOMBER, an individual;
22 CLINT FREEMAN, an individual;
23 RICHARD BAILEY, an individual;
24 JOHN KLIER, an individual; JUSTIN
25 SMITH, an individual; JOHN
26 PHILLIPS, an individual; PWGG, L.P., a
27 California Limited Partnership;
28 CHERYL PRINCE, an individual;
DARIN PRINCE, an individual; NORTH
COUNTY SHOOTING CENTER, INC.,
a California Corporation; RYAN
PETERSON, an individual;
GUNFIGHTER TACTICAL, LLC, a
California Limited Liability Company,
FIREARMS POLICY COALITION,

Case No. 3:20-cv-02190-DMS-DEB

**DECLARATION OF PLAINTIFF
HANNAH SPOUSTA IN
SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’
MOTION TO DISMISS**

Date/Time: To Be Set By Court
Time: 13A
Judge: Hon. Dana M. Sabraw
Trial Date: None set
Action Filed: 11/10/2020

1 INC.; SAN DIEGO COUNTY GUN
2 OWNERS PAC; CITIZENS
3 COMMITTEE FOR THE RIGHT TO
4 KEEP AND BEAR ARMS; and
5 SECOND AMENDMENT
6 FOUNDATION,

7 Plaintiffs,

8 vs.

9 XAVIER BECERRA, in his official
10 capacity as Attorney General of
11 California; and LUIS LOPEZ, in his
12 official capacity as Director of the
13 Department of Justice Bureau of
14 Firearms,

15 Defendants.

16 I, HANNAH SPOUSTA, declare as follows:

17 1. I am an adult resident of the County of San Diego, California, and am
18 a named Plaintiff in the above matter. I have personal knowledge of the facts stated
19 herein, and if called as a witness, I could competently testify to these facts.

20 2. This declaration is executed in support of Plaintiffs' Opposition to
21 Defendants' Motion to Dismiss.

22 3. I am not prohibited under state or federal law from possessing,
23 receiving, owning, or purchasing a firearm.

24 4. I possess a valid COE issued by the Defendants' Department of Justice
25 Bureau of Firearms.

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5. I am a member and supporter of Plaintiffs FIREARMS POLICY COALITION, SAN DIEGO COUNTY GUN OWNERS PAC, CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS, and SECOND AMENDMENT FOUNDATION.

6. But for California’s Handgun Ban and Defendants’ active enforcement thereof, I would purchase for self-defense and other lawful purposes a Springfield Armory Hellcat, Sig 365, CZ Scorpion, HK SP5, and/or Sig MPX, all of which are handguns in common use for self-defense and other lawful purposes and widely sold and possessed outside of California.

7. Because the handguns that I would purchase for lawful purposes are currently excluded from Defendants’ Roster of purportedly “safe” handguns, California’s Handgun Ban bars me from purchasing and taking possession of them from a licensed retailer, who are likewise prohibited from selling them to me on pain of criminal sanction.

8. I have no other lawful method of purchasing these handguns in California.

I declare under penalty of perjury that the foregoing is true and correct.

02/15/2021

Executed on _____.



HANNAH SPOUSTA

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