

SEILER EPSTEIN ZIEGLER & APPEGATE LLP
Attorneys at Law

1 George M. Lee (SBN 172982)
2 **SEILER EPSTEIN ZIEGLER & APPEGATE LLP**
3 601 Montgomery Street, Suite 2000
4 San Francisco, CA 94111
5 Phone: (415) 979-0500
6 Fax: (415) 979-0511
7 Email: gml@sezalaw.com

8 Attorneys for Plaintiffs
9 ARIE VAN NIEUWENHUYZEN,
10 THE CALGUNS FOUNDATION,
11 FIREARMS POLICY COALITION,
12 FIREARMS POLICY FOUNDATION,
13 SECOND AMENDMENT FOUNDATION, and
14 MADISON SOCIETY FOUNDATION

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **EASTERN DIVISION**

18 ARIE VAN NIEUWENHUYZEN, an
19 individual; THE CALGUNS
20 FOUNDATION; FIREARMS POLICY
21 COALITION; FIREARMS POLICY
22 FOUNDATION; SECOND
23 AMENDMENT FOUNDATION; and
24 MADISON SOCIETY FOUNDATION,

25 Plaintiffs,

26 vs.

27 STANLEY SNIFF, in his capacity as
28 Sheriff of the County of Riverside;
RIVERSIDE COUNTY SHERIFF'S
DEPARTMENT, a public entity; and
COUNTY OF RIVERSIDE,
CALIFORNIA,

Defendants.

Case No. 5:18-cv-02225-DDP-SHK

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR ISSUANCE OF
PRELIMINARY INJUNCTION**

[FRCP 65(a)]

Date: November 26, 2018

Time: 10:00 a.m.

Courtm. 9C

Judge: Hon. Dean D. Pregerson

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1 TO ALL DEFENDANTS AND THEIR ATTORNEYS OF RECORD:
2 PLEASE TAKE NOTICE that on **November 26, 2018**, at **10:00 a.m.**, or as
3 soon thereafter as the matter may be heard in Courtroom 9C of the above-entitled
4 United States District Court, located at the United States Courthouse, 350 West 1st
5 Street, Los Angeles, CA. 90012, Hon. Dean D. Pregerson presiding, plaintiffs
6 ARIE VAN NIEUWENHUYZEN, THE CALGUNS FOUNDATION,
7 FIREARMS POLICY COALITION, FIREARMS POLICY FOUNDATION,
8 SECOND AMENDMENT FOUNDATION and MADISON SOCIETY
9 FOUNDATION (“plaintiffs”) will and hereby do move this Court for an order
10 issuing a preliminary injunction pursuant to FRCP 65(a), enjoining defendants
11 STANLEY SNIFF, in his capacity as Sheriff of the County of Riverside, the
12 RIVERSIDE COUNTY SHERIFF’S DEPARTMENT, and the COUNTY OF
13 RIVERSIDE (“defendants”) from enforcing, and continuing to enforce, implement
14 or abide by their policy which prohibits non-U.S. citizens who are otherwise
15 qualified, lawful permanent residents, not prohibited from owning firearms, from
16 applying or obtaining a permit to carry a concealed weapon (“CCW”) under state
17 law. The grounds for this motion are that the defendants’ CCW policies violate the
18 Equal Protection Clause of the Fourteenth Amendment, and the Second
19 Amendment to the United States Constitution, and otherwise conflict with and are
20 preempted by applicable state law, and that plaintiff has and will continue to suffer
21 irreparable injury in the absence of preliminary injunctive relief from such policies.

22 In support of this motion, plaintiffs and moving parties will rely upon this
23 motion and memorandum of points and authorities attached hereto, the supporting
24 declarations and exhibits thereto, the complete records on file of the above-entitled
25 action, and other matters of which the Court may take judicial notice, and any
26 other such evidence and argument as the Court may consider upon hearing of the
27 matter.
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1 Dated: October 24, 2018

SEILER EPSTEIN ZIEGLER & APLEGATE LLP

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/s/ George M. Lee
George M. Lee

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Attorney for Plaintiffs

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