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6 Attorneys for Defendants County of Ventura
(also erroneously sued as Ventura County Public
7 Health Care Agency), Sheriff William Ayub
(erroneously sued as Bill Ayub), Robert
8 Levin and William T. Foley

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 DONALD MCDUGALL, an individual; JULIANA GARCIA, an individual; SECOND AMENDMENT FOUNDATION; CALIFORNIA GUN RIGHTS FOUNDATION; and FIREARMS POLICY COALITION, INC.,
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16 Plaintiffs,
17 vs.
18 COUNTY OF VENTURA, CALIFORNIA; BILL AYUB, in his official capacity; WILLIAM T. FOLEY, in his official capacity; ROBERT LEVIN, in his official capacity; and VENTURA COUNTY PUBLIC HEALTH CARE AGENCY,
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22 Defendants.
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No. 2:20 cv-02927 CBM(ASX)
DECLARATION OF CHARMAINE H. BUEHNER IN SUPPORT OF DEFENDANTS’ MOTION TO DISMISS FIRST AMENDED COMPLAINT
Date: June 30, 2020
Time: 10:00 a.m.
Ctrm: 8b
Judge: Hon. Consuelo B. Marshall
Trial: Not Set
Complaint Filed: March 28, 2020

24 I, Charmaine H. Buehner, state as follows:

25 1. I am an attorney licensed to practice law in the State of California. I am
26 an Assistant County Counsel with the County of Ventura (“County”) and represent
27 defendant County, as well as the individual defendants named in the above-
28 captioned action, all of whom have been named in their official capacity: William

1 Ayub, the County Sheriff, Robert Levin, M.D., the County Health Officer, and
2 William T. Foley, the Director of the Ventura County Health Care Agency, in
3 which the County’s Public Health Department resides. The defendant identified as
4 “Ventura County Public Health Care Agency” is not an agency or department of
5 the County, nor are the Health Care Agency or the Public Health Department legal
6 entities separate from the County. All named defendants are collectively referred
7 to herein as “Defendants.” I have personal knowledge of the facts stated herein
8 and, if called as a witness, I could and would competently testify thereto.

9 2. On April 30, 2020 and in follow-up email correspondence on May 21
10 and 26, 2020, I conducted a telephonic conference of counsel with plaintiffs’
11 counsel Ronda Baldwin-Kennedy and Raymond DiGuseppe pursuant to Local
12 Rule 7-3.

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

15
16 Dated: June 2, 2020

15 /s/
16 _____
17 CHARMAINE H. BUEHNER
Assistant County Counsel

18 Attorneys for Defendant County of Ventura
19 (also erroneously sued as Ventura County Public
20 Health Care Agency), Sheriff William Ayub
(erroneously sued as Bill Ayub), Robert Levin
and William T. Foley

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