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5 Attorneys for Plaintiff/Petitioner,  
**CALGUNS FOUNDATION, INC.**

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8 **SUPERIOR COURT OF CALIFORNIA**  
9 **COUNTY OF VENTURA**  
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11 CALGUNS FOUNDATION, INC,	)	<b>Case No.: 56-2010-00383664-CU-WM-VTA</b>
12 Plaintiff/Petitioner,	)	<b>[PROPOSED] ORDER AND JUDGMENT</b>
13 v.	)	<b>GRANTING MOTION FOR</b>
	)	<b>PEREMPTORY WRIT OF MANDATE</b>
14 COUNTY OF VENTURA, VENTURA	)	Hearing Date: May 6, 2011
15 COUNTY SHERIFF'S DEPARTMENT, BOB	)	Time: 8:30
16 BROOKS, in his individual capacity and	)	Location: Department 42
17 and DOES 1 through 10, inclusive,	)	Reservation Number: 1545418
18 Defendants/Respondents.	)	Petition filed: October 15, 2010
19	)	
20	)	

21 This matter came regularly for hearing on May 6, 2011, at 8:30 a.m., in Department 42 of  
22 the above-entitled court, the Honorable, Henry J. Walsh, Judge, presiding. Petitioner, The  
23 Calguns Foundation, Inc., appeared by its attorney, Jason A. Davis of Davis & Associates,  
24 Mission Viejo, California. Respondents County of Ventura, Ventura County Sheriff's  
25 Department, and Bob Brooks appeared by their attorney, Assistant County Counsel, Marina  
26 Porsche. The Court having considered the papers and oral argument, and good cause appearing,  
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1 IT IS HEREBY ORDERED THAT:

- 2 1. Petitioner's petition for writ of mandate be, and the same hereby is, GRANTED  
3 and judgment entered for Petitioner.
- 4 2. Respondents have a duty to permit public access to and the copying of the records  
5 and information requested by Petitioner pursuant to California Public Records Act  
6 (PRA)(Gov't Code 6250 *et seq.*),
- 7 3. The Respondents have, in violation of the PRA, refused to produce the following  
8 documents responsive to Petitioner's requests, warranting a writ of mandamus, which  
9 shall issue from the Court, ordering the production within fifteen (15) days of the  
10 following:
- 11 a. Pages 11 and 13 of each Application for a Carry Permit submitted to  
12 Respondents for the period beginning January 1, 2007 and ending July 15,  
13 2010, as well as any additional pages necessary for the applicants to  
14 complete those portions of Section 7 of the application.
  - 15 b. A copy of all carry licenses, licenses amendments and/or denial letters  
16 issued in response to applications for carry permits for the period  
17 beginning January 1, 2007, and ending July 15, 2010.
- 18 4. Respondents may (at their option and expense) redact the following information:
- 19 a. Information related to when or where the applicant is vulnerable to attack;
  - 20 b. The applicant's medical or psychological history or that of members of his  
21 or her family;
  - 22 c. The home address and telephone number of peace officers, judges, court  
23 commissioners, and magistrates;
  - 24 d. Respondents will comply, as ordered herein, with the PRA in their  
25 response to all future requests for carry permit applications and supporting  
26 documents.
- 27 5. Respondents shall make and file a return to the writ to this Court demonstrating  
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1 that it has satisfied the directives set forth in herein no later than forty-five (45) days  
2 from the date of entry of the writ.

3 6. Petitioner, being the prevailing party to this action, is hereby awarded its costs and  
4 attorney's fees incurred in pursuing this matter. Respondents shall pay Petitioner  
5 reasonable costs and attorneys fees totaling \$\_\_\_\_\_.

6 Dated: \_\_\_\_\_, 2011

7  
8 \_\_\_\_\_  
9 THE HONORABLE HENRY J. WALSH  
10 Judge of the Superior Court

1 **PROOF OF SERVICE**  
2 **(CCP Sec. 1013(a))**

3 *The Calguns Foundation, Inc. v. County of Ventura, et al.*

4 STATE OF CALIFORNIA )  
5 )  
6 COUNTY OF VENTURA )

7 I am employed in the County of Orange, State of California, I am over the age of 18 years and  
8 not a party to the within action; my business address is 27281 Las Ramblas, Ste: 200, Mission  
9 Viejo, CA 92691.

10 On this date, I served the foregoing document described as:

11 **[PROPOSED] ORDER AND JUDGMENT GRANTING MOTION FOR PEREMPTORY**  
12 **WRIT OF MANDATE**

13 Said document was served on the interested party or parties in this action by placing a true copy  
14 thereof, enclosed in a sealed envelope, and addressed as noted below.

15 I am familiar with our firm's practice of collection and processing correspondence for mailing.  
16 Under that practice it would be deposited with the U.S. Postal Service on that same day with  
17 postage thereon fully prepaid at Mission Viejo, California in the ordinary course of business. I  
18 am aware that on motion of the party served, service is presumed invalid if the postal  
19 cancellation date or postage meter date is more than one working day after the date of deposit for  
20 mailing in this declaration.

21 \_\_\_\_\_ (By Mail) I deposited such envelope in the mail at City of Mission Viejo, California.  
22 The envelope was mailed with postage thereon fully prepaid.

23  X  (By Facsimile) In addition to regular mail, I sent this document via facsimile, number(s)  
24 as listed on the attached mailing list.

25 \_\_\_\_\_ (By Personal Service) Such envelope was delivered by hand to the below addressee.

26 \_\_\_\_\_ (By Overnight Mail) I arranged for such envelope to be delivered to the following  
27 addresses by overnight mail.

28 Executed on March 30, 2011, at City of Mission Viejo, California.

I declare under penalty of perjury under the laws of the State of California that the above is true  
and correct. I further declare that I am employed in the office of a member of the bar of this  
court at whose direction the service was made.

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30 \_\_\_\_\_  
31 JASON DAVIS

**MAILING LIST**

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Case Name: *The Calguns Foundation, Inc. v. County of Ventura, et al.*  
Court: Ventura Superior Court  
Case Number: 56-2010-00383664-CU-WM-VTA

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County of Ventura, Ventura County  
Sheriff's Department, and Bob Brooks, in  
his individual and official capacities.