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14		
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	•	
15	David Borges, and Loran Kelley	
15 16	•	STATE OF CALIFORNIA
16	David Borges, and Loran Kelley	
16 17	David Borges, and Loran Kelley SUPERIOR COURT OF THE	OF LOS ANGELES
16	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF	OF LOS ANGELES Case No. 21STCV06257
16 17 18	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE PEOPLE OF THE STATE OF CALIFORNIA	OF LOS ANGELES
16 17	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel
16 17 18	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE PEOPLE OF THE STATE OF CALIFORNIA	Case No. 21STCV06257 [Related to Case No. 21STCV29196]
16 17 18 19 20	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE PEOPLE OF THE STATE OF CALIFORNIA	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32]
16 17 18 19	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE PEOPLE OF THE STATE OF CALIFORNIA Plaintiffs,	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL
16 17 18 19 20 21	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE PEOPLE OF THE STATE OF CALIFORNIA Plaintiffs, vs.	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF
16 17 18 19 20	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation;	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR
16 17 18 19 20 21	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation; DAVID BORGES, an individual; LORAN	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF
16 17 18 19 20 21 22 23	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation;	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR JUDICIAL NOTICE Date: May 19, 2023
16 17 18 19 20 21 22	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation; DAVID BORGES, an individual; LORAN KELLEY, an individual,	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR JUDICIAL NOTICE Date: May 19, 2023 Time: 8:30 a.m.
16 17 18 19 20 21 22 23 24	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation; DAVID BORGES, an individual; LORAN	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR JUDICIAL NOTICE Date: May 19, 2023 Time: 8:30 a.m. Department: 32
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16 17 18 19 20 21 22 23 24 25	David Borges, and Loran Kelley SUPERIOR COURT OF THE FOR THE COUNTY OF THE STATE OF CALIFORNIA Plaintiffs, vs. POLYMER80, INC., a Nevada Corporation; DAVID BORGES, an individual; LORAN KELLEY, an individual,	Case No. 21STCV06257 [Related to Case No. 21STCV29196] [Assigned for all purposes to the Hon. Daniel S. Murphy, Department 32] DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR JUDICIAL NOTICE Date: May 19, 2023 Time: 8:30 a.m. Department: 32 Reservation ID: 305522480553

28

DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST FOR JUDICIAL NOTICE

- I, Michael Marron, declare as follows:
- 1. I am Senior Counsel with the law firm of Greenspoon Marder LLP, an attorney at law duly licensed to practice in all of the Courts of the State of New York, and admitted *pro hac vice* to appear in this action on behalf of Defendants Polymer80, Inc., David Borges, and Loran Kelley. I respectfully submit this declaration in support of Defendants' contemporaneously filed Request for Judicial Notice in Support of Motion for Judgment on the Pleadings or, in the alternative, for a Stay ("RJN").
- 2. I have personal knowledge of the facts set forth herein. If called and sworn as a witness, I could and would competently testify as to those facts
- 3. Attached as **EXHIBIT A** to Defendants' RJN is a true and correct copy of Amended Order Granting in Part and Denying in Part Plaintiffs' Motion for Preliminary Injunction, *Renna v. Bonta* (S.D. Cal. Apr. 3, 2023) No. 3:20-cv-02190-DMS-DEB, ECF No. 81.
- 4. Attached as **EXHIBIT B** to Defendants' RJN is a true and correct copy of Notice of Preliminary Injunction Appeal, *Renna v. Bonta* (S.D. Cal. Apr. 14, 2023) No. 3:20-cv-02190-DMS-DEB, ECF No. 86.
- 5. Attached as **EXHIBIT C** to Defendants' RJN is a true and correct copy of Order Granting Plaintiffs' Motion for Preliminary Injunction, *Boland v. Bonta* (C.D. Cal. Mar. 20, 2023) No. 8:22-cv-01421-CJC-ADS, ECF No. 60.
- 6. Attached as **EXHIBIT D** to Defendants' RJN is a true and correct copy of Order, *Boland v. Bonta* (9th Cir. Mar. 31, 2023) No. 23-55276, ECF No. 7.
- 7. Attached as **EXHIBIT E** to Defendants' RJN is a true and correct copy of Opinion & Order on Polymer80, Inc.'s Motion for Temporary Restraining Order and Preliminary Injunction, *Polymer80, Inc. v. Garland* (N.D. Tex. Mar. 19, 2023) No. 4:23-cv-00029-O, ECF No. 27.
- 8. Attached as **EXHIBIT F** to Defendants' RJN is a true and correct copy of Memorandum of Points and Authorities in Support of Demurrer of Defendants Polymer80, Inc., David

1	PROOF OF SERVICE			
2	The People of The State of California vs. Polymer80, Inc., David Borges, Loran Kelley Case No. 21STCV06257			
3 4	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
5	FOR THE COUNTY OF LOS ANGELES			
6	I am employed in the County of Jefferson, State of Alabama. I am over the age of eighteen years and not a party to this action. My business address is 1819 5th Avenue N, Birmingham, AL			
7	35203. On April 27, 2023, I served true and correct copies of the following document(s) described as DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS' REQUEST			
8	EOD HIDICIAL NOTICE on the interested parties in this action as follows:			
9	SEE ATTACHED SERVICE LIST			
10	BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an			
11	agreement of the parties to accept service by e-mail or electronic transmission, I caused document(s) to be sent from e-mail address clamar@bradley.com to the persons at the e-mail address listed in the Service List. I did not receive, within a reasonable time after the transmission, a electronic message or other indication that the transmission unsuccessful.			
12				
13				
14	I declare under penalty of perjury under the laws of the State of California that the foregoin is true and correct.			
15	Executed on April 27, 2023 at Birmingham, Alabama.			
16				
17	/s/ W. Chadwick Lamar, Jr.			
18	W. Chadwick Lamar, Jr.			
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1	SERVICE LIST		
2 3	The People of The State of California vs. Polymer80, Inc., David Borges, Loran Kelley Case No. 21STCV06257		
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