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 8 *General of the State of California*  
*and Allison Mendoza in her Official*  
 9 *Capacity as Director of the Bureau of*  
*Firearms*

10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION

15 **WILLIAM WIESE, et al.,**  
 16 Plaintiffs,  
 17 v.  
 18 **ROB BONTA, et al.,**  
 19 Defendants.

Case No. 2:17-cv-00903-WBS-KJN

**DECLARATION OF ROBERT L.  
 MEYERHOFF REQUESTING LEAVE TO  
 FILE LATE DECLARATION IN  
 SUPPORT OF DEFENDANTS'  
 OPPOSITION TO MOTION FOR  
 SUMMARY JUDGMENT AND COUNTER-  
 MOTION FOR SUMMARY JUDGMENT**

Date: July 10, 2023  
 Time: 1:30 p.m.  
 Courtroom: 5, 14<sup>th</sup> Floor  
 Judge: Hon. William B. Shubb

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**DECLARATION OF ROBERT L. MEYERHOFF**

I, Robert L. Meyerhoff, declare under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen (18) years, competent to testify to the matters contained in this declaration, and testify based on my personal knowledge and information.

2. I am a Deputy Attorney General with the California Department of Justice, and serve as counsel to Defendants Rob Bonta in his official capacity as Attorney General of the State of California and Allison Mendoza in her Official Capacity as Director of the Bureau of Firearms (“Defendants”).

3. On May 1, 2023, I filed Defendants’ Notice of Counter-Motion for Summary Judgment (Dkt. No. 125), Opposition to Plaintiffs’ Motion for Summary Judgment and Counter-Motion for Summary Judgment (Dkt. No. 125-1), Appendix 1 (Dkt No. 125-2), Statement of Disputed Fact in Opposition to Plaintiffs’ Motion for Summary Judgment (Dkt. No. 125-3), Statement of Undisputed Fact in Support of Defendants’ Counter-Motion for Summary Judgment (Dkt. No. 125-4), twelve declarations in support thereof (Dkt. Nos. 125-5 to 125-16), and a proposed order (Dkt. No. 125-17).

4. I intended to include a thirteenth declaration, the Declaration of Dennis Baron, as part of this filing, but inadvertently failed to do so. I was alerted to my failure to do so this afternoon, and filed this declaration shortly thereafter with the Court.

5. Attached as Exhibit A to this Declaration is a true and correct copy of the Declaration of Dennis Baron, which is cited

1 at pp. 16 and 45 of Defendants' Opposition to Plaintiffs' Motion  
2 for Summary Judgment and Counter-Motion for Summary Judgment  
3 (Dkt. No. 125-2) and at pp. 3 and 4 of Defendants' Statement of  
4 Undisputed Fact (125-4).

5 6. I request leave of court to file the attached declaration  
6 of Dennis Baron in support of Defendants' opposition and counter-  
7 motion. I apologize to the Court and counsel for the inadvertent  
8 error in not including Mr. Baron's declaration in the filing with  
9 the other supporting papers. Granting the leave requested herein  
10 will allow for a complete record on summary judgment relating to  
11 an important California law and I believe will be of assistance  
12 to the Court in deciding the issues presented by the motions. I  
13 do not believe that any prejudice will be caused to Plaintiffs by  
14 granting the leave requested herein. Plaintiffs have previously  
15 filed their motion for summary judgment, their reply in support  
16 of their motion and their response to Defendants' counter-motion  
17 are not due until May 31, 2023, and the hearing on the motion is  
18 not until July 10, 2023.

19 I declare under penalty of perjury under the laws of the  
20 United States of America that the foregoing is true and correct.

21 Executed on May 5, 2023, at Los Angeles, CA.

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23 /s/ Robert L. Meyerhoff  
24 Robert L. Meyerhoff  
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