

1 ROB BONTA, State Bar No. 202668
Attorney General of California
2 MARK BECKINGTON, State Bar No. 126009
Supervising Deputy Attorney General
3 ROBERT L. MEYERHOFF, State Bar No. 298196
Deputy Attorney General
4 300 South Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 269-6177
Fax: (916) 731-2144
6 E-mail: Robert.Meyerhoff@doj.ca.gov
Attorneys for Defendants

7
8 George M. Lee, State Bar No. 172982
SEILER EPSTEIN LLP
4 Embarcadero Center, 14th Floor
9 San Francisco, CA 94111
Telephone: (415) 979-0500
10 Fax: (415) 979-0511

11 Raymond M. DiGuiseppe, State Bar No. 228457
THE DIGUISEPPE LAW FIRM, P.C.
12 116 N. Howe Street, Suite A
Southport, NC 28461
13 Telephone: (910) 713-8804
Fax: (910) 672-7705
14 *Attorneys for Plaintiffs*

15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE EASTERN DISTRICT OF CALIFORNIA
17 SACRAMENTO DIVISION

19 **WILLIAM WIESE, et al.,**

20 Plaintiffs,

21 v.

23 **XAVIER BECERRA, et al.,**

24 Defendants.

2:17-cv-00903-WBS-KJN

**STIPULATION RE: DEPOSITION
SCHEDULING PURSUANT TO THE
COURT'S JUNE 27, 2023 ORDER**

1 Plaintiffs William Wiese, Jeremiah Morris, Lance Cowley, Sherman Macaston, Frank
2 Federau, Alan Normandy, Todd Nielsen, Calguns Foundation, Firearms Policy Foundation,
3 Firearms Policy Coalition, Firearms Policy Foundation, Second Amendment Foundation, Second
4 Amendment Coalition, Adam Richards, Clifford Flores, and I.Q. Dang, and Defendants Rob
5 Bonta in his official capacity as Attorney General of California and Allison Mendoza in her
6 official capacity as Acting Director of the Department of Justice Bureau of Firearms (Defendants,
7 and together with Plaintiffs, the Parties) hereby stipulate and agree as follows:

8 WHEREAS, on June 27, 2023, the Court issued an order granting Defendants leave to
9 take thirteen depositions of individuals who submitted declarations on Plaintiffs' behalf in this
10 case by July 28, 2023 (Dkt. No. 132) (the "Order");

11 WHEREAS, on June 28, 2023, the Parties began meeting and conferring regarding the
12 scheduling of those depositions;

13 WHEREAS, as of today's date (July 20, 2023), six of those individuals have been
14 deposed, and two more of those individuals are scheduled to be de deposed by July 27, 2023;

15 WHEREAS, the Parties have tentatively reached an agreement to forego the depositions
16 of three of the declarants;

17 WHEREAS, despite their best efforts, Plaintiffs were unable to produce the two remaining
18 declarants (*i.e.*, Alan Normandy and James Curcuruto) for deposition by July 28, 2023, but are
19 able to make them available on August 2, 2023 and August 3, 2023, respectively;

20 WHEREAS, Defendants are able to depose Messrs. Normandy and Curcuruto on those
21 dates and do not seek to adjust any of the other deadlines set forth in the Order as a result of those
22 depositions occurring after July 28, 2023;

23 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties that,
24 with the Court's permission, the deadline for depositions to be completed pursuant to the Order
25 be extended to August 3, 2023.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 21, 2023

ROB BONTA
Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General

/s/ Robert L. Meyerhoff
ROBERT L. MEYERHOFF
Deputy Attorney General
Attorneys for Defendants

Dated: July 21, 2023

SEILER EPSTEIN LLP

/s/ Raymond M. DiGuiseppe
Raymond M. DiGuiseppe
Attorneys for Plaintiffs