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16 *[Additional Counsel on following page.]*

17 **IN THE UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**  
19 **WESTERN DIVISION**

20 MICHELLE FLANAGAN, et al.,

21 Plaintiffs,

22 v.

23 CALIFORNIA ATTORNEY  
GENERAL XAVIER BECERRA, in  
24 his official capacity as Attorney  
General of the State of California, et  
25 al.,

26 Defendants.  
27  
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Case No.: 2:16-cv-06164-JAK-AS

**JOINT STIPULATION TO AMEND  
THE JUDGMENT BY JUNE 12, 2018**

Action Filed: August 17, 2016

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11 *Attorneys for Defendant Sheriff James McDonnell*  
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1 Plaintiffs Michelle Flanagan, Samuel Golden, Dominic Nardone, Jacob  
2 Perkio, and The California Rifle & Pistol Association, Inc. (collectively  
3 “Plaintiffs”) and Defendant Xavier Becerra, in his official capacity as Attorney  
4 General of the State of California (“Defendant Becerra”), and Defendant Sherriff  
5 James McDonnell, in his official capacity as Sherriff of Los Angeles County,  
6 California (“LASD”), (collectively, “Defendants”) hereby stipulate as follows:

7 WHEREAS, on February 23, 2017, the Court granted LASD’s motion to  
8 dismiss all of Plaintiffs’ claims against LASD and dismissed LASD without  
9 prejudice, and granted, in part, Defendant Becerra’s motion to dismiss some of  
10 Plaintiffs’ claims against Defendant Becerra;

11 WHEREAS, on September 11, 2017 Plaintiffs and Defendant Becerra filed  
12 cross motions for summary judgment as to Plaintiffs’ remaining claim against  
13 Defendant Becerra;

14 WHEREAS, on May 7, 2018, this Court issued an order denying Plaintiffs’  
15 motion for summary judgment and granting Defendant Becerra’s cross motion;

16 WHEREAS, on May 24, 2018, Judgment was entered in favor of Defendant  
17 Becerra in this matter and against Plaintiffs, the form and substance of which  
18 Judgment was agreed to between Plaintiffs and Defendant Becerra, but  
19 unintentionally omitted LASD;

20 WHEREAS, the May 24, 2018 Judgment should have included all parties,  
21 including the previously dismissed LASD, under the Final Judgment doctrine;

22 WHEREAS, in lieu of a Motion to Amend the Judgment, all parties have  
23 jointly agreed to amend the Judgment to include LASD as a prevailing party;

24 WHEREAS, on June 5, 2018, without realizing the unintentional omission of  
25 LASD from the Judgment entered on May 24, 2018, Plaintiffs filed a Notice of  
26 Appeal with this Court based on that Judgment;

27 WHEREAS, as a result of Plaintiffs’ filing of that Notice of Appeal, the  
28 United States Court of Appeals for the Ninth Circuit has already set deadlines in the

1 appeal of this matter, including for Mediation Questionnaires, which are due on  
2 June 12, 2018;

3 NOW THEREFORE, the parties hereby stipulate and request that the Court  
4 amend its previously entered Judgment in this matter per the [Proposed] Amended  
5 Judgment filed herewith, prior to June 12, 2018, so that Plaintiffs can amend the  
6 Notice of Appeal to clarify that all Defendants are included therein.

7  
8 IT IS SO STIPULATED.

9 Respectfully submitted,

10 Dated: June 7, 2018

MICHEL & ASSOCIATES, P.C.

11  
12 /s/Sean A. Brady

13 Sean A. Brady  
Attorneys for Plaintiffs

14 Dated: June 7, 2018

XAVIER BECERRA  
Attorney General of California  
STEPAN A. HAYTAYAN  
Supervising Deputy Attorney General  
P. PATTY LI  
Deputy Attorney General

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19 /s/Patty Li

20 P. PATTY LI  
Deputy Attorney General  
*Attorneys for Defendant Xavier Becerra*

21  
22 Dated: June 7, 2018

MARY C. WICKHAM  
County Counsel

23  
24 /s/Lana Choi

25 Lana Choi  
Deputy County Counsel  
*Attorneys for Defendant Sheriff James McDonnell*

**CERTIFICATE OF SERVICE**

**IN THE UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**WESTERN DIVISION**

Case Name: *Flanagan, et al. v. California Attorney General Xavier Becerra, et al.*  
Case No.: 2:16-cv-06164-JAK-AS

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**JOINT STIPULATION TO AMEND THE JUDGMENT BY JUNE 12, 2018**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Xavier Becerra, Attorney General of California	<i>Attorneys for Defendant</i>
P. Patty Li, Deputy Attorney General	<i>Attorney General of the State</i>
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I declare under penalty of perjury that the foregoing is true and correct.

Executed June 7, 2018.

/s/Laura Palmerin  
Laura Palmerin