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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

16 B & L PRODUCTIONS, INC., d/b/a
17 CROSSROADS OF THE WEST, et al.,
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19 Plaintiffs,
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21 v.
22
23 22nd DISTRICT AGRICULTURAL
24 ASSOCIATION, et al.,
25
26 Defendants.

CASE NO.: 3:19-cv-00134-CAB-NLS
**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR LEAVE TO FILE
SUPPLEMENTAL COMPLAINT**
Date: May 1, 2020
Judge: Hon. Cathy Ann Bencivengo
PER CHAMBERS RULES, NO ORAL
ARGUMENT UNLESS SEPARATELY
ORDERED BY THE COURT.
Action Filed: January 21, 2019

1 PLEASE TAKE NOTICE THAT on May 1, 2020, or as soon thereafter as the
2 matter may be heard, and only if the Court issues an order setting forth the date and
3 time for oral argument, in Courtroom 4C of the United States District Court, Southern
4 District of California, located at 221 West Broadway, San Diego, California 92101,
5 Plaintiffs B & L Productions, Inc., Barry Bardack, Ronald J. Diaz, Sr., John Dupree,
6 Christopher Irick, Lawrence Walsh, Maximum Wholesale, Inc., California Rifle &
7 Pistol Association, Incorporated, South Bay Rod and Gun Club, Inc., and Second
8 Amendment Foundation will move the Court for an order granting leave to file a
9 supplemental complaint.

10 Plaintiffs bring this motion because events occurring after the filing of the
11 original complaint have caused Plaintiffs additional but similar injuries as those
12 originally complained about. California has adopted a new law prohibiting firearm and
13 ammunition sales at the Del Mar Fairgrounds--the same public venue affected by
14 Defendant's gun show moratorium, which was the subject of Plaintiffs' original
15 pleading. Plaintiffs' challenge to the new law is sufficiently related to Plaintiffs
16 original claims because it is part of a larger scheme to ban gun shows at the
17 Fairgrounds. The new law invites the same constitutional harms on Plaintiffs that the
18 moratorium did, and it is unconstitutional for the same reasons the moratorium is. But
19 the relief Plaintiffs currently seek in their complaint would not be sufficient to redress
20 injuries caused by this new law.

21 This motion is based on this notice, the memorandum of points and authorities
22 and the request for judicial notice filed simultaneously herewith, as well as any
23 exhibits attached thereto. This motion is also based on the pleadings and records
24 already on file, and on any further matters the Court deems appropriate.

25 Dated: March 27, 2020

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Plaintiffs

Email: abarvir@michellawyers.com

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Case Name: *B & L Productions, Inc., et al. v. 22nd District Agricultural Association, et al.*

Case No.: 3:19-cv-00134 CAB (NLS)

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:

**PLAINTIFFS’ NOTICE OF MOTION AND MOTION FOR LEAVE TO
FILE SUPPLEMENTAL COMPLAINT**

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

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Attorneys for Defendants

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 27, 2020.

s/ Laura Palmerin

Laura Palmerin