Defendants, County of Ventura, Sheriff William Ayub, Dr. Robert Levin and Director William T. Foley (collectively "Defendants") and plaintiffs Donald McDougall, Juliana Garcia, Second Amendment Foundation, California Gun Rights Foundation and Firearms Policy Coalition, Inc. (collectively "Plaintiffs"), by and through their respective counsel of record, stipulate and agree as follows:

- 1. On March 28, 2020, Plaintiffs filed the complaint in this action but did not serve it on Defendants (ECF Doc. No. 1).
- 2. On March 30, 2020, Plaintiffs filed an ex parte application for a temporary restraining order (ECF Doc. Nos. 9 & 10), which the court denied on April 1, 2020 (ECF Doc. No. 12).
- 3. On April 14, 2020, Plaintiffs filed a first amended complaint (ECF Doc. No. 19) and a motion for preliminary injunction ("MPI") (ECF Doc. No. 20).
- 4. On April 21, 2020, Plaintiffs served the operative complaint and MPI on Defendants. Plaintiffs set a hearing date on the MPI for May 12, 2020.
  - 5. No prior continuances have been requested by any party.
- 6. Plaintiffs service of the MPI does not provide Defendants with sufficient notice of the motion under Local Rule 6-1, nor does it provide Defendants with a meaningful opportunity to respond to the MPI, given that under Local Rule-7-9, Defendants opposition to the MPI would be otherwise due on the same day Plaintiffs served the motion.

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