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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO

DAVID GENTRY, JAMES PARKER,  
MARK MIDLAM, JAMES BASS, and  
CALGUNS SHOOTING SPORTS  
ASSOCIATION,

Plaintiffs and Petitioners,

v.

ROB BONTA, in His Official Capacity as  
Attorney General For the State of  
California; STEPHEN LINDLEY, in His  
Official Capacity as Acting Chief for the  
California Department of Justice, BETTY  
T. YEE, in Her Official Capacity as State  
Controller, and DOES 1 - 10,

Defendants and Respondents.

**FILED**  
**Superior Court Of California,**  
**Sacramento**  
**08/18/2021**  
**tcrowther**  
**By \_\_\_\_\_, Deputy**  
**Case Number:**  
**34-2013-80001667**

Case No. 34-2013-80001667

**JOINT STIPULATION TO EXTEND TIME TO  
FILE MEMORANDA OF COSTS AND  
MOTION FOR ATTORNEY'S FEES;  
[PROPOSED] ORDER**

Action Filed: October 16, 2013

The parties to this Action, through their respective counsel, hereby stipulate and agree to  
the following:

WHEREAS, this Court entered the final judgment in this action on April 10, 2019;

WHEREAS, Plaintiffs appealed that judgment on June 5, 2019;

1 WHEREAS, pursuant to the parties' previous stipulation and this Court's Order issued  
2 May 22, 2019, the deadline to file a memorandum of cost or motion for attorney's fees (or both)  
3 is 40 days after the reviewing court mails notice of issuance of remittitur;

4 WHEREAS, the Remittitur was mailed by the reviewing court on June 3, 2021 making the  
5 deadline to file the memorandum of cost or motion for attorney's fees (or both) July 13, 2021;

6 WHEREAS, pursuant to the parties' previous stipulation and this Court's Order issued  
7 July 7, 2021, the deadline was extended to August 27, 2021;

8 WHEREAS, the parties are currently engaging in settlement discussions (including  
9 exchange of offers) that could potentially result in resolution of all remaining disputes in this  
10 matter, which would make any motion attorney's fees and/or costs unnecessary; and

11 WHEREAS, the parties agree that they need more time to determine whether they will  
12 reach an agreement.

13 THEREFORE, based on the foregoing facts, the parties hereby stipulate as follows.

- 14 1. The deadline to file a memorandum of costs or motion for attorney's fee (or both)  
15 is extended 45 days from the current deadline of August 27, 2021.

16 **SO STIPULATED.**

17 Dated: August 17, 2021

**MICHEL & ASSOCIATES, P.C.**



Sean A. Brady  
Attorneys for the Plaintiffs/Petitioners

21 Dated: August 17, 2021

**ROB BONTA**  
**Attorney General of California**  
**ANTHONY R. HAKL**  
**Supervising Deputy Attorney General**



Ryan A. Hanley  
Attorneys for Defendants/Respondents

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DAVID GENTRY, JAMES PARKER,  
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Defendants and Respondents.

Case No. 34-2013-80001667

**[PROPOSED] ORDER RE: EXTENSION OF  
TIME TO FILE MEMORANDA OF COSTS  
AND MOTION FOR ATTORNEY’S FEES**

Action Filed: October 16, 2013

Based on the stipulation of the parties dated August 17, 2021, and good cause appearing,  
the Court hereby extends the relevant deadlines as follows:

- 1. The deadline to file a memorandum of costs or motion for attorney’s fee (or both) is  
extended 45 days from the current deadline of August 27, 2021, to October 12, 2021.

**IT IS SO ORDERD.**

Date: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Judge of the Superior Court

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**PROOF OF SERVICE**

STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, CA 90802.

On August 17, 2021, the foregoing document described as:

**JOINT STIPULATION TO EXTEND TIME TO FILE MEMORANDA OF COSTS AND MOTION FOR ATTORNEY’S FEES; [PROPOSED] ORDER**

on the interested parties in this action by placing

- the original
- a true and correct copy

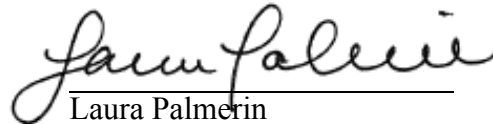
thereof enclosed in sealed envelope(s) addressed as follows:

Ryan A. Hanley  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
[Ryan.Hanley@doj.ca.gov](mailto:Ryan.Hanley@doj.ca.gov)

*Attorney for Defendants*

- (BY ELECTRONIC MAIL)** As follows: I served a true and correct copy by electronic transmission. Said transmission was reported and completed without error.
- (STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 17, 2021, at Long Beach, California.

  
\_\_\_\_\_  
Laura Palmerin