

1 ROB BONTA
 Attorney General of California
 2 ANTHONY R. HAKL
 Supervising Deputy Attorney General
 3 RITA BOSWORTH
 Deputy Attorney General
 4 State Bar No. 234964
 455 Golden Gate Avenue, Suite 11000
 5 San Francisco, CA 94102
 Telephone: (415) 510-3592
 6 Fax: (415) 703-1234
 E-mail: Rita.Bosworth@doj.ca.gov
 7 *Attorneys for Defendants Attorney*
General Rob Bonta and Director Luis
 8 *Lopez, in their official capacities*

9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 11 CIVIL DIVISION

13 **LANA RAE RENNA, et al.,**
 14 Plaintiffs,
 15 v.
 16 **ROB BONTA, in his official capacity**
 17 **as Attorney General of California;**
 18 **and LUIS LOPEZ, in his official**
 19 **capacity as Director of the**
 20 **Department of Justice Bureau of**
 21 **Firearms,**
 Defendants.

3:20-cv-02190-DMS-DEB

**STIPULATION TO AMEND
DISCOVERY SCHEDULE**

Courtroom: 3A
 Judge: The Honorable Daniel E. Butcher
 Trial Date: March 20, 2023
 Action Filed: November 10, 2020

22 On September 16, 2021, Plaintiffs and Defendants jointly submitted a Joint
 23 Discovery Plan. Dkt. 25. On September 23, 2021, this Court held a case
 24 management conference, and it subsequently issued a Scheduling Order Regulating
 25 Discovery and Other Pre-Trial Proceedings. Dkt. 30. The dates in the Court’s order
 26 largely track the dates the parties agreed to in their Joint Discovery Plan. However,
 27 upon further study, the parties note that in the Court’s order, the parties are required
 28 to designate their rebuttal experts prior to expert reports being exchanged. The

1 parties request that the Court permit potential rebuttal experts to review expert
2 reports first. This will ensure that that the appropriate experts may be designated to
3 testify. As such, the parties propose modifying the scheduling order to require
4 expert reports to be exchanged prior to the disclosure of rebuttal experts.

5 The parties jointly propose the following case dates and deadlines:

- 6 • Fact discovery cut-off: April 22, 2022 (same as Dkt. 30)
- 7 • Initial expert disclosures and reports deadline: May 20, 2022 (changed)
- 8 • Rebuttal expert disclosures and reports deadline: June 21, 2022 (changed)
- 9 • Expert discovery cutoff: July 22, 2022 (same as Dkt. 30)

10 The parties agree that other dates as set forth in the Court’s order, Dkt. 30,
11 would remain the same.

13 Dated: November 23, 2021

Respectfully submitted,

14 ROB BONTA
15 Attorney General of California
16 ANTHONY R. HAKL
Supervising Deputy Attorney General

17 /s/ Rita B. Bosworth

18 RITA B. BOSWORTH
19 Deputy Attorney General
20 *Attorneys for Defendants Attorney
General Rob Bonta and Director Luis
Lopez, in their official capacities*

21 Dated: November 23, 2021

22 THE DIGUISEPPE LAW FIRM, P.C.
23 4320 Southport-Supply Road, Suite 300
24 Southport, NC 28461
25 Tel.: 910-713-8804
26 Email: law.rmd@gmail.com

27 /s/ Raymond M. DiGuiseppe

28 RAYMOND M. DIGUISEPPE
Attorneys for Plaintiffs

SA2020304764
42973183.docx

