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20 *Appearing Pro Hac Vice*

21 Attorneys for Plaintiffs

22 **UNITED STATES DISTRICT COURT**
23 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

24 LANA RAE RENNA, et al.,
25 Plaintiffs,

26 vs.

27 ROB BONTA, et al.,
28 Defendants.

Case No.: 20-cv-2190-DMS-DEB

NOTICE OF MOTION AND
MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL FOR
PLAINTIFF RICHARD BAILEY

1 **NOTICE TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

2 PLEASE TAKE NOTICE that through this motion Raymond M. DiGuiseppe
3 of the DiGuiseppe Law Firm, P.C., Michael P. Sousa of the Law Offices of Michael
4 P. Sousa, APC, and William Sack of Firearms Policy Coalition (“Plaintiffs’
5 Counsel”), hereby request leave to withdraw as counsel of record for Plaintiff
6 Richard Bailey (and Plaintiff Bailey only) pursuant to District Local Rule 83.3(f)(3).

7
8 **MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF BAILEY**

9 As detailed in the supporting Declaration of Raymond M. DiGuiseppe,
10 Plaintiff Bailey’s continuing lack of response to communications from Plaintiffs’
11 Counsel and failure to participate in the discovery process, and the lack of any
12 indication that he intends to participate and cooperate as necessary in the future
13 unfortunately compel Plaintiffs’ Counsel to seek withdrawal as counsel for Plaintiff
14 Bailey. Accordingly, Plaintiffs’ Counsel bring this motion requesting such relief.

15 Dated: February 18, 2022

Respectfully submitted,

16 /s/Raymond M. DiGuiseppe
17 The DiGuiseppe Law Firm, P.C.
18 Raymond M. DiGuiseppe
19 CA State Bar No. 228457
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Suite 300
20 Southport, NC 28461
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22
23 Dated: February 18, 2022

Respectfully submitted,

24 /s/Michael P. Sousa
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Dated: February 18, 2022

Respectfully submitted,
/s/William Sack
William Sack
Firearms Policy Coalition
5550 Painted Mirage Road, Suite 320
Las Vegas, NV 89149
Tel: 916-596-3492
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9 Defendants.

Case No.: 20-cv-2190-DMS-DEB

CERTIFICATE OF SERVICE

10
11 I, the undersigned, am a citizen of the United States and am at least eighteen
12 years of age. My business address is 4320 Southport-Supply Road Suite 300,
13 Southport, NC 28461. I am not a party to the above-entitled action.

14 I have caused service of the foregoing Motion to Withdraw as Counsel for
15 Richard Bailey and the Declaration of Raymond M. DiGuseppe in Support of the
16 Motion on the following parties, by electronically filing the foregoing with the Clerk
17 of the District Court using its ECF system which provides notice and service to them:

18 ROB BONTA
19 Attorney General of California
20 ANTHONY R. HAKL
21 Supervising Deputy Attorney General
22 GABRIELLE D. BOUTIN, SBN 267308
23 RITA BOSWORTH, SBN 234964
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Attorneys for Defendants Attorney General
Rob Bonta and Director Luis Lope, in their official capacities

