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Attorney for Plaintiff Second Amendment Foundation

IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JUNIOR SPORTS MAGAZINES  
INC., RAYMOND BROWN;  
CALIFORNIA YOUTH SHOOTING  
SPORTS ASSOCIATION, INC.;  
REDLANDS CALIFORNIA YOUTH  
CLAY SHOOTING SPORTS INC.;  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED;  
THE CRPA FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
and SECOND AMENDMENT  
FOUNDATION,

Plaintiffs,

v.

ROB BONTA, in his official capacity  
as Attorney General of the State of  
California; and DOES 1-10,

Defendants.

CASE NO: 2:22-cv-04663-CAS (JCx)

**PLAINTIFFS' EX PARTE  
APPLICATION FOR ORDER  
SHORTENING TIME FOR HEARING  
ON PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is given that counsel for Plaintiffs Junior Sports Magazines  
3 Incorporated, Raymond Brown, California Youth Shooting Sports Foundation, Inc.,  
4 Redlands California Youth Clay Shooting Sports Inc., California Rifle & Pistol  
5 Association, Incorporated, The CRPA Foundation, Gun Owners of California, and  
6 the Second Amendment Foundation (collectively, “Plaintiffs”), hereby apply to this  
7 Court ex parte for an order to shorten time to hear Plaintiffs’ Motion for Preliminary  
8 Injunction. Plaintiffs respectfully ask this Court to advance the hearing on their  
9 motion for preliminary injunction—filed on July 20, 2022, and currently scheduled  
10 to be heard on August 22, 2022—to August 8, 2022, upon 19 days’ notice to  
11 Defendants. Plaintiffs will also seek an order that any opposition be due on or before  
12 July 29, 2022, and any reply be due on or before August 3, 2022.

13 On July 18, 2022, Plaintiffs’ counsel contacted Deputy Attorney General  
14 Kevin J. Kelly, counsel for Defendants, to provide notice that Plaintiffs intended to  
15 file an ex parte application for an order shortening time to hear their anticipated  
16 motion for preliminary injunction on July 19, 2022, and the grounds for the  
17 requested relief. Barvir Decl. ¶ 5. Plaintiffs’ counsel also informed Mr. Kelly that if  
18 Defendant intended to oppose Plaintiffs’ application, he would have 48 hours from  
19 the filing and service of the application to file any opposition. *Id.* Mr. Kelly said that  
20 Defendant Bonta would oppose Plaintiffs’ request for an order shortening time. *Id.*

21 Plaintiffs bring this application for good cause on the grounds that they  
22 require a near-immediate order on their motion for preliminary injunction, halting  
23 the enforcement of California Business & Professions Code section 22949.80, which  
24 Plaintiffs argue violates their rights under the First and Fourteenth Amendments.  
25 Barvir Decl. ¶ 7. The harm to Plaintiffs (and countless others throughout the  
26 country) is ongoing and compounds every day the law remains in effect. *Id.* ¶ 11.

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1 This application is based on the memorandum of points and authorities and  
2 the declaration of Anna M. Barvir concurrently filed with this application, as well as  
3 all the records currently on file and any oral argument the Court may authorize.  
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5 Dated: July 20, 2022

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

6 *s/ Anna M. Barvir*

7 Anna M. Barvir  
8 Counsel for Plaintiffs Junior Sports Magazines  
9 Incorporated, Raymond Brown, California  
10 Youth Shooting Sports Association, Inc.,  
Redlands California Youth Clay Shooting  
Sports Inc., California Rifle & Pistol  
Association, Inc., The CRPA Foundation, and  
Gun Owners of California

11 Dated: July 20, 2022

**LAW OFFICES OF DONALD KILMER, APC**

12 *s/ Donald Kilmer*

13 Donald Kilmer  
14 Counsel for Second Amendment Foundation  
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**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Junior Sports Magazines, Inc., et al. v. Bonta*  
Case No.: 2:22-cv-04663-CAS (JCx)

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:

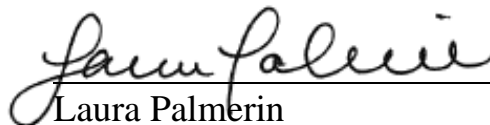
**PLAINTIFFS' EX PARTE APPLICATION FOR ORDER SHORTENING  
TIME FOR HEARING ON PLAINTIFFS' MOTION FOR PRELIMINARY  
INJUNCTION**

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

Kevin J. Kelly, Deputy Attorney General  
[kevin.kelly@doj.ca.gov](mailto:kevin.kelly@doj.ca.gov)  
300 South Spring Street, Suite 9012  
Los Angeles, CA 90013  
*Attorney for Defendant*

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

Executed July 20, 2022.

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