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 7 Newsom, Attorney General Rob Bonta,  
 Secretary Karen Ross, and 22nd District  
 8 Agricultural Association

9  
 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
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13 B&L PRODUCTIONS, INC., d/b/a  
 14 CROSSROADS OF THE WEST,  
 et. al.,

15 Plaintiffs,

16 v.

17 GAVIN NEWSOM, et al.,

18 Defendants.  
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Case No. 3:21-cv-01718-AJB-KSC

**DECLARATION OF CHARLES J. SAROSY IN SUPPORT OF JOINT MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT**

[L.R. 7.2, 12.1]

Judge: The Hon. Anthony J. Battaglia

Action Filed: 10/4/2021

1 I, Charles J. Sarosy, declare as follows:

2 1. I am a Deputy Attorney General in the California Attorney General's  
3 Office. I am a counsel of record for Defendants Governor Gavin Newsom,  
4 Attorney General Rob Bonta, Secretary Karen Ross, and the 22nd District  
5 Agricultural Association, in the above-captioned matter. I have personal  
6 knowledge of each fact stated in this declaration, and if called as a witness I could  
7 and would testify competently to them under oath.

8 2. Plaintiffs' Complaint (ECF No. 1) in this matter was filed on October 4,  
9 2021. ECF No. 1.

10 3. Plaintiffs completed service of the Complaint and Summons on  
11 Defendants Attorney General Bonta and Secretary Ross on November 2, 2021, and  
12 on Defendants 22nd District Agricultural Association and District Attorney  
13 Summer Stephan on November 8, 2021.

14 4. Defendant County Counsel Eldridge has yet to be properly served the  
15 Complaint and Summons because he was recently substituted as a party on  
16 November 16, 2021 (ECF No. 10)

17 5. Defendant Governor Newsom was not properly served the Complaint  
18 and Summons on November 2, 2021. Plaintiffs attempted to serve the Sacramento  
19 office of Attorney General Bonta with the Complaint and Summons for Governor  
20 Newsom, but service was ultimately rejected.

21 6. If this Court grants in full the Joint Motion to Extend Time to Respond to  
22 the Complaint, then Defendant Governor Newsom will waive service of the  
23 Complaint and Summons.

24 7. On November 17 and 18, 2021, I conferred—by email—with counsel for  
25 Plaintiffs and counsel for Defendants District Attorney Summer Stephan and  
26 County Counsel Lonnie Eldridge. We all agreed that an extension of time for  
27 Defendants to respond to the Complaint was appropriate because not all Defendants  
28 had yet been properly served the Complaint and Summons, some of those who were

1 served were served on different dates, the response deadline accordingly varied for  
2 many of the Defendants, and the Complaint raises several complex claims and  
3 issues. Counsel for all parties agreed to an extension date of Monday, January 24,  
4 2022, which is 62 days (60 days fell on a Saturday) after the current response  
5 deadline for Defendants Attorney General Bonta and Secretary Ross.

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed on November 22, 2021, at Los Angeles, California.

s/ Charles J. Sarosy  
Charles J. Sarosy

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**CERTIFICATE OF SERVICE**

Case Name: **B&L Productions, et al. v. Gavin Newsom, et al.** No. **3:21-cv-01718**

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I hereby certify that on November 22, 2021, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

JOINT MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT and  
DECLARATION OF CHARLES J. SAROSY IN SUPPORT OF JOINT MOTION TO  
EXTEND TIME TO RESPOND TO THE COMPLAINT

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On November 22, 2021, I have caused to be mailed in the Office of the Attorney General's internal mail system, the foregoing document(s) by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

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*Attorneys for Defendants District Attorney  
Summer Stephan and County Counsel Lonnie  
Eldridge*

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 22, 2021, at Los Angeles, California.

Lois E. Smith  
\_\_\_\_\_  
Declarant

s/Lois E. Smith  
\_\_\_\_\_  
Signature