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 Summer Stephan and County Counsel Lonnie
 14 Eldridge

15 *[Additional Counsel listed on next page]*

16
 17 IN THE UNITED STATES DISTRICT COURT
 18 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

<p>20 B&L PRODUCTIONS, INC., d/b/a CROSSROADS OF THE WEST, et. 21 al.,</p> <p>22 Plaintiffs,</p> <p>23</p> <p>24 v.</p> <p>25 GAVIN NEWSOM, et al.,</p> <p>26 Defendants.</p> <p>27</p>

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

**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 *[Additional Counsel continued from prior page]*

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15 *Attorneys for Plaintiffs B&L Productions, Inc.,*
16 *Bardack, Diaz, Dupree, Irick, Solis, Walsh,*
17 *Captain Jon's Lockers, LLC, LAX Firing*
18 *Range, Inc., California Rifle & Pistol*
19 *Association, Inc., and South Bay Rod and Gun*
20 *Club, Inc.*

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27 *Attorney for Plaintiff Second Amendment*
28 *Foundation*

1 Pursuant to Rules 7.2 and 12.1 of the Local Rules for the United States District
2 Court for the Southern District of California, and this Court’s Civil Case Procedures,
3 Plaintiffs B & L Productions, Inc., d/b/a Crossroads of the West; Ronald J. Diaz, Sr.;
4 John Dupree; Christopher Irick; Robert Solis; Lawrence M. Walsh; Captain Jon’s
5 Lockers, LLC.; LAX Firing Range, Inc., d/b/a LAX Ammo; California Rifle &
6 Pistol Association, Incorporated; South Bay Rod and Gun Club, Inc.; and Second
7 Amendment Foundation (collectively, “Plaintiffs”), and Defendants Governor Gavin
8 Newsom, in his official and individual capacity; Attorney General Rob Bonta, in his
9 official and individual capacity; Karen Ross, Secretary of California Department of
10 Food & Agriculture, in her official and individual capacity; the 22nd District
11 Agricultural Association; District Attorney Summer Stephan, in her official
12 capacity; and County Counsel Lonnie Eldridge, in his official capacity (collectively,
13 “Defendants,” and together with Plaintiffs, the “Parties”), by and through their
14 attorneys, hereby stipulate and jointly move as follows:

15 WHEREAS, Plaintiffs’ Complaint (ECF No. 1) was filed in this Court on
16 October 4, 2021;

17 WHEREAS, the Parties agree that Plaintiffs completed service of the
18 Complaint and Summons on Defendants Attorney General Bonta and Secretary Ross
19 on November 2, 2021, and on Defendants 22nd District Agricultural Association
20 and District Attorney Summer on November 8, 2021;

21 WHEREAS, the Parties agree that Defendant County Counsel Eldridge has yet
22 to be properly served the Complaint and Summons because he was recently
23 substituted as a party on November 16, 2021 (ECF No. 10);

24 WHEREAS, the Parties agree that Defendant Governor Newsom was not
25 properly served the Complaint and Summons on November 2, 2021;

26 WHEREAS, the Parties agree that if this Court grants this Joint Motion in full,
27 then Defendant Governor Newsom will waive service of the Complaint and
28 Summons;

1 WHEREAS, four Defendants have varying response deadlines as a result of the
2 different dates of service (November 23 for Attorney General Bonta and Secretary
3 Ross; November 29 for the 22nd District Agricultural Association and District
4 Attorney Stephan), and two Defendants (Governor Newsom and County Counsel
5 Eldridge) currently have no response deadline because they have not been properly
6 served the Complaint and Summons;

7 WHEREAS, given that a single response deadline for all Defendants would
8 enhance judicial economy, and given the number and complexity of the claims and
9 issues raised in the Complaint, the Parties agree that an extension of time for
10 Defendants to respond to the Complaint is appropriate;

11 NOW, THEREFORE, in consideration of the foregoing, the Parties further
12 stipulate and jointly move as follows:

13 Defendants' time to answer, move to dismiss, or otherwise respond to the
14 Complaint shall be extended to January 24, 2022.

15 **IT IS SO STIPULATED**
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Dated: November 22, 2021

Respectfully submitted,
ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

s/ Charles J. Sarosy

CHARLES J. SAROSY
Deputy Attorney General
Attorneys for Defendants Governor Gavin Newsom, Attorney General Rob Bonta, Secretary Karen Ross, and 22nd District Agricultural Association

Dated: November 22, 2021

LONNIE J. ELDRIDGE
San Diego County Counsel

s/ Timothy M. White

TIMOTHY M. WHITE
Senior Deputy County
Attorneys for Defendants District Attorney Summer Stephan and County Counsel Lonnie Eldridge

Dated: November 22, 2021

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir
Attorneys for Plaintiffs B&L Productions, Inc., Bardack, Diaz, Dupree, Irick, Solis, Walsh, Captain Jon's Lockers, LLC, LAX Firing Range, Inc., California Rifle & Pistol Association, Inc., and South Bay Rod and Gun Club, Inc.

Dated: November 22, 2021

Law Offices of Donald Kilmer, APC

s/ Donald Kilmer

Donald Kilmer
Attorney for Plaintiff Second Amendment Foundation

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CERTIFICATE OF SERVICE

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

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:

Donald E.J. Kilmer, Jr.
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Attorney for Second Amendment Foundation

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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