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 8 Rob Bonta and Director Luis Lopez, in their
 official capacities

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

13
 14 **LANA RAE RENNA et al.,**

15 Plaintiffs,

16 v.

17 **ROB BONTA, in his official capacity**
 18 **as Attorney General of California;**
 19 **and LUIS LOPEZ, in his official**
 20 **capacity as Director of the**
Department of Justice Bureau of
Firearms,

21 Defendants.

3:20-cv-02190-DMS-DEB

**DECLARATION OF GABRIELLE
 BOUTIN IN SUPPORT OF JOINT
 MOTION FOR EXTENSIONS OF
 TIME FOR DEFENDANTS TO
 RESPOND TO SECOND
 AMENDED COMPLAINT AND TO
 FILE ANSWER**

Judge: Hon. Dana M. Sabraw
 Dept: 13A
 Action Filed: 11/10/2020

1 I, Gabrielle D. Boutin, hereby declare as follows:

2 1. I am a Deputy Attorney General with the California Department of
3 Justice and serve as counsel in this action for Defendants Attorney General Rob
4 Bonta and Luis Lopez, Director of the California Department of Justice Bureau of
5 Firearms, in their official capacities. I make this declaration in support of the
6 parties' Joint Motion for Extensions of Time for Defendants to Respond to the
7 Second Amended Complaint and To File Answer (Joint Motion). I have personal,
8 first-hand knowledge of the matters set forth below and, if called as a witness, I
9 could and would testify competently thereto.

10 2. In the Joint Motion, the parties ask the Court for an order extending time
11 for Defendants to file a response to the Second Amended Complaint (SAC). They
12 request an extension from September 5 to October 6, 2022. Good cause exists to
13 grant this extension. Absent a court order, the Federal Rules of Civil Procedure
14 permit only 14 days to answer a complaint following the filing of amended
15 complaint. Fed. R. Civ. Proc. 15(a)(3). However, the SAC is 74 pages long and
16 has greatly expanded the number and complexity of the issues in this case,
17 including through new challenges to additional statutes and new causes of action.
18 *See* ECF. No 49. As a result of this expansion, and the recent decision in *New*
19 *York State Rifle & Pistol Association, Inc. v. Bruen*, __ U.S. __, 142 S.Ct. 2111
20 (2022), Defendants require additional time to analyze the SAC and to consider and
21 prepare their response.

22 3. In the Joint Motion, the parties also request an order that if Defendants
23 file a Rule 12(b) motion, their deadline to file an answer is extended until fourteen
24 days after the Court rules on that motion. Good cause exists to grant this requested
25 extension. The SAC is lengthy and consists of many new allegations. *See* ECF.
26 No 49. Preparation of an answer to all allegations would require a substantial
27 expenditure of time and effort—one that may not be wholly necessary if the Court
28 grants a motion to dismiss.

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

2 Executed on this 26th day August, 2022 in Davis, California.

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/s/ Gabrielle D. Boutin
Gabrielle D. Boutin