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

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 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**
 21 **Department of Justice Bureau of**
 22 **Firearms,**
 Defendants.

3:20-cv-02190-DMS-DEB

**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

23 Plaintiffs and Defendants respectfully submit this joint motion in accordance
 24 with Civil Rules 7.2 and 12.1 for an order extending the time for Defendants
 25 Attorney General Rob Bonta and Director Luis Lopez to file a response to the
 26 Second Amended Complaint (SAC). They request an extension from **September 5**
 27 **to October 6, 2022.**

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1 Defendants further request an order that if Defendants file a Rule 12(b)
2 motion, their deadline to file an answer is extended until fourteen days after the
3 Court rules on that motion.

4 On June 23, 2022, the United States Supreme Court issued its opinion in *New*
5 *York State Rifle & Pistol Association, Inc. v. Bruen*, __ U.S. __, 142 S.Ct. 2111
6 (2022) and altered the legal landscape in Second Amendment cases by establishing
7 a new framework for analyzing Second Amendment claims. The parties expect that
8 *Bruen* will affect the manner in which this Court analyzes Plaintiffs' Second
9 Amendment claims in this case.

10 Accordingly, following the parties' joint motion, this Court issued an order
11 on July 22, 2022, vacating the scheduling order and granting Plaintiffs' leave to file
12 an amended complaint by August 22, 2022. ECF No. 46. Defendants filed the
13 SAC on August 22, 2022. ECF No. 49. Defendants' deadline to file a response to
14 the SAC is therefore currently September 6, 2022. *See* Fed. R. Civ. Proc. 15(a)(3).

15 Good cause exists to grant the requested extension to respond. Absent a
16 court order, the Federal Rules of Civil Procedure permit only 14 days to answer a
17 complaint following the filing of amended complaint. Fed. R. Civ. Proc. 15(a)(3).
18 However, the SAC is 74 pages long and has greatly expanded the number and
19 complexity of the issues in this case, including through new challenges to
20 additional statutes and new causes of action. *See* ECF No. 49; Declaration of
21 Gabrielle Boutin (Boutin Decl.), ¶ 2. As a result of this expansion, as well as the
22 *Bruen* decision, Defendants require additional time to analyze the SAC and to
23 consider and prepare their response. Boutin Decl., ¶ 2.

24 Good cause also exists for the Court to extend Defendants' time to file an
25 answer to the SAC until after any motion to dismiss is decided. The SAC is
26 lengthy and consists of many new allegations. *See* ECF No. 49; Declaration of
27 Boutin Decl., ¶ 3. Preparation of an answer to all allegations would require a
28 substantial expenditure of time and effort—one that may not be wholly necessary if

1 the Court grants a motion to dismiss. Boutin Decl., ¶ 3.

2 For these reasons, the parties jointly move the Court to issue an order
3 granting the requested extensions.

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Dated: August 26, 2022

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

/s/ Gabrielle D. Boutin
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Dated: August 26, 2022

Respectfully submitted,
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to, and I have obtained authorization to affix the electronic signatures of, the above signatories to this document.

DATED: August 26, 2022

/s/ Gabrielle D. Boutin
Gabrielle D. Boutin