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10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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 14 **B&L PRODUCTIONS, INC., d/b/a
 15 CROSSROADS OF THE WEST, et.
 16 al.,**

17 **Plaintiffs,**

18 **v.**

19 **GAVIN NEWSOM, et al.,**

20 **Defendants.**

Case No. 8:22-cv-01518 JWH (JDEx)

**STIPULATION AND JOINT
 MOTION TO EXTEND TIME TO
 RESPOND TO THE COMPLAINT
 BY MORE THAN 30 DAYS (L.R. 7-
 1, 8-3)**

Complaint served date: Varying dates
 Current response date: First response
 due September 19, 2022
 New response date: November 14,
 2022

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12 *California Rifle & Pistol Association, Inc., Gerald*
13 *Clark, Eric Johnson, Chad Littrell, Jan Steven*
14 *Merson, Asian Pacific American Gun Owner*
15 *Association, Second Amendment Law Center, Inc.*

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16 *Foundation*

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1 Pursuant to Local Rules 7-1 and 8-3 of the United States District Court for the
2 Central District of California, and the Federal Rules of Civil Procedure, Plaintiffs
3 B&L Productions, Inc., d/b/a/ Crossroads of the West, Gerald Clark, Eric Johnson,
4 Chad Littrell, Jan Steven Merson, California Rifle & Pistol Association, Inc., Asian
5 Pacific American Gun Owners Association, Second Amendment Law Center, Inc.,
6 and Second Amendment Foundation (collectively, “Plaintiffs”) and Defendants
7 Gavin Newsom, in his official capacity as Governor of the State of California, Rob
8 Bonta, in his official capacity as Attorney General of the State of California, Karen
9 Ross, in her official capacity as Secretary of California Department of Food and
10 Agriculture and in her personal capacity, and the 32nd District Agricultural
11 Association (collectively, “Stipulating Defendants” and together with Plaintiffs, the
12 “Stipulating Parties”), by and through their attorneys, hereby stipulate and jointly
13 move to the following below. Defendant Todd Spitzer, sued in his official capacity
14 as the District Attorney of Orange County, is not a party to this stipulation and is
15 represented by separate counsel.

16 WHEREAS, Plaintiffs’ Complaint (ECF No. 1) was filed in this Court on
17 August 12, 2022;

18 WHEREAS, Plaintiffs completed service of the Complaint and Summons on
19 the 32nd District Agricultural Association on August 29, 2022, the Attorney General
20 Rob Bonta on August 30, 2022, Karen Ross on August 31, 2022, and Governor
21 Gavin Newsom on September 13, 2022;

22 WHEREAS, the Stipulating Defendants currently have varying response
23 deadlines as a result of the different dates of service;

24 WHEREAS, a single response deadline for the Stipulating Defendants would
25 enhance judicial economy, and given the number and complexity of the claims and
26 issues raised in the Complaint, the Stipulating Parties agree that an extension of
27 time for the Stipulating Defendants to respond to the Complaint is appropriate;
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1 NOW, THEREFORE, in consideration of the foregoing, the Stipulating Parties
2 further stipulate and jointly move as follows;

3 The Stipulating Defendants’ time to answer, move to dismiss, or otherwise
4 respond to the Complaint shall be extended to November 14, 2022.

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6 **IT IS SO STIPULATED.**

7 Dated: September 15, 2022

Respectfully submitted,

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ROB BONTA
Attorney General of California
R. MATTHEW WISE
Supervising Deputy Attorney General

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/s/NICOLE J. KAU
Deputy Attorney General
*Attorneys for Defendants Governor
Gavin Newsom, Attorney General
Rob Bonta, Secretary Karen Ross,
and 32nd District Agricultural
Association*

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15 Dated: September 15, 2022

MICHEL & ASSOCIATES, P.C.

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/s/Anna M. Barvir
Anna M. Barvir
*Attorneys for Plaintiffs B&L Productions, Inc.,
California Rifle & Pistol Association, Inc.,
Gerald Clark, Eric Johnson, Chad Littrell, Jan
Steven Merson, Asian Pacific American Gun
Owner Association, Second Amendment Law
Center, Inc.*

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23 Dated: September 15, 2022

Law Offices of Donald Kilmer, APC

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/s/ Donald Kilmer
Donald Kilmer
*Attorney for Plaintiff Second Amendment
Foundation*

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CERTIFICATE OF SERVICE

Case Name: **B&L Productions, Inc., et al. v. Gavin Newsom, et al.** No. **8:22-cv-01518 JWH (JDEx)**

I hereby certify that on September 16, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION AND JOINT MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT BY MORE THAN 30 DAYS (L.R. 7-1, 8-3)

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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 September 16, 2022, at Los Angeles, California.

Blanca Cabrera

Declarant

/s/ Blanca Cabrera

Signature