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*Attorneys for Rob Bonta, in his official  
 8 capacity as California Attorney General, and  
 Blake Graham, in his official capacity as  
 9 Acting Director of the Department of Justice  
 Bureau of Firearms*

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

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 15 **LANA RAE RENNA et al.,**

16 Plaintiffs,

17 v.

18 **ROB BONTA, in his official capacity  
 19 as Attorney General of California;  
 20 and BLAKE GRAHAM, in his official  
 capacity as Acting Director of the  
 Department of Justice Bureau of  
 21 Firearms,**

22 Defendants.

3:20-cv-02190-DMS-DEB

**DECLARATION OF GABRIELLE  
 BOUTIN IN SUPPORT OF  
 DEFENDANTS' OPPOSITION TO  
 MOTION FOR TEMPORARY  
 RESTRAINING ORDER AND  
 PRELIMINARY INJUNCTION**

Date: October 7, 2022  
 Time: 1:30 p.m.  
 Dept: 13A  
 Judge: The Honorable Dana M.  
 Sabraw  
 Trial Date: None set  
 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 Blake Graham, Acting Director of the California Department of Justice  
5 Bureau of Firearms, in their official capacities. I make this declaration in support  
6 of Defendants' Opposition to Motion for Temporary Restraining Order and  
7 Preliminary Injunction. I have personal, first-hand knowledge of the matters set  
8 forth below and, if called as a witness, I could and would testify competently  
9 thereto.

10 2. Attached hereto as Exhibit A is a true and correct copy of an email I sent  
11 to Plaintiffs' attorneys Ray DiGiuseppe and Michael Sousa on September 20, 2022.  
12 In the email I proposed, on behalf of Defendants, a stipulation in which Plaintiffs  
13 would agree to dismiss with prejudice their claims in the Second Amended  
14 Complaint challenging section 2 of Senate Bill 1327 and Defendants would agree to  
15 not seek attorneys' fees or costs from Plaintiffs or their attorneys pursuant to  
16 section 2 of SB 1327 in connection with the present lawsuit.

17 3. On September 22, 2022, I spoke on the phone with Mr. DiGiuseppe  
18 regarding the emailed proposal. We agreed on behalf of our clients to enter into a  
19 written stipulation, with the terms as proposed, but with individual Plaintiffs  
20 dismissing with prejudice and the remaining Plaintiffs dismissing without  
21 prejudice.

22 4. The parties' attorneys are currently working to prepare the written  
23 stipulation and they plan to file it with the court as soon as practicable and before  
24 the hearing on Plaintiffs' motion.

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

2 Executed on this 23rd day September, 2022 in Davis, California.

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/s/ Gabrielle D. Boutin  
Gabrielle D. Boutin

# EXHIBIT A

**From:** [Gabrielle Boutin](#)  
**To:** ["Raymond DiGiuseppe"](#)  
**Cc:** [Michael Sousa](#)  
**Subject:** Renna v. Bonta  
**Date:** Tuesday, September 20, 2022 1:29:00 PM

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Dear Ray,

I write with a proposal regarding the Renna plaintiffs' claims in the Second Amended Complaint challenging certain provisions of SB 1327. If plaintiffs will agree to dismiss those claims with prejudice, Defendants will agree to not seek attorneys' fees or costs from plaintiffs or their attorneys pursuant to section 2 of SB 1327 in connection with the present lawsuit. This would not constitute a waiver of fees or costs based on any other legal theory or incurred in any other action. If you are amenable to this agreement, we would be willing to enter into a written stipulation.

We would appreciate if you would let us know your position soon, since we would like to update the court on any such agreement in our opposition to the Motion for Temporary Restraining Order and Preliminary Injunction, which is due this Friday.

Thanks!

Brie

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