

IN THE  
UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

_____	)	
KIM RHODE, <i>et al.</i> ,	)	
	)	
Plaintiffs-Appellees,	)	
	)	
v.	)	No. 20-55437
	)	
ROB BONTA, in his official capacity as	)	
Attorney General of the State of California,	)	
	)	
Defendant-Appellant.	)	
_____	)	

**MOTION FOR LEAVE TO FILE BRIEF *AMICI CURIAE***

*Amici Curiae* Gun Owners of America, Inc., Gun Owners Foundation, Gun Owners of California, Heller Foundation, Oregon Firearms Federation, Virginia Citizens Defense League, Tennessee Firearms Association, Grass Roots North Carolina, Rights Watch International, America's Future, Inc., Downsize DC Foundation, DownsizeDC.org, Conservative Legal Defense and Education Fund, and Restoring Liberty Action Committee hereby move for leave to file a brief *amicus curiae* in support of Plaintiffs-Appellees. It is hereby stated as follows:

1. All parties have consented to the filing of this *amicus* brief.

2. As stated more fully in the attached brief, *amici curiae* have extensive experience with respect to the issues presented by this case, and have an significant interest in the outcome of this case. These *amici* filed an *amicus curiae* brief in this case on August 7, 2020. *Amici* believe that this brief will be of assistance to the Court in its application of the Supreme Court's recent decision in *New York State Rifle & Pistol Association v. Bruen* to this case.

3. This *amicus* brief is being filed seven days after the time set by the Court's order for the Plaintiffs-Appellees' supplemental brief, and two weeks before the Defendant-Appellant's optional supplemental reply brief. Thus, it is believed that no party will be prejudiced by the filing of this brief.

WHEREFORE, we respectfully request that this Court grant leave to file an *amicus curiae* brief in support of Plaintiffs-Appellees.

Respectfully submitted,

/s/ Jeremiah L. Morgan

Jeremiah L. Morgan

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Attorneys for *Amici Curiae*

September 29, 2022

### **CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing Motion for Leave to File Brief *Amici Curiae*, was made, this 29<sup>th</sup> day of September 2022, by the Court's Case Management/ Electronic Case Files system upon the attorneys for the parties.

/s/ Jeremiah L. Morgan  
Jeremiah L. Morgan  
Attorney for *Amici Curiae*