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 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;
 and BLAKE GRAHAM, in his official
 20 capacity as Acting Director of the
 Department of Justice Bureau of
 21 Firearms,**

22 Defendants.
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3:20-cv-02190-DMS-DEB

**JOINT MOTION AND
 STIPULATION REGARDING
 PLAINTIFFS' CLAIMS
 CHALLENGING SENATE BILL
 1327**

Judge: The Honorable Dana
 M. Sabraw
 Trial Date: None set
 Action Filed: 11/10/2020

JOINT MOTION

1
2 Plaintiffs and Defendants respectfully submit this Joint Motion in accordance
3 with Local Civil Rule 7.2. Plaintiffs and Defendants have entered into the
4 stipulation below regarding Plaintiffs’ fourth through seventh claims in the Second
5 Amended Complaint, which challenge the constitutionality of section 2 of Senate
6 Bill 1327, codified in California Code of Procedure section 1021.11. The parties
7 respectfully ask the Court to approve the stipulation so that, in accordance with
8 Local Rules, the stipulation is binding on the Court. *See* L. Civ. R. 7.2(a), (b).

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10 Dated: September 28, 2022

Respectfully submitted,
11 ROB BONTA
Attorney General of California
12 ANTHONY R. HAKL
Supervising Deputy Attorney General

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14 */s/ Gabrielle D. Boutin*
GABRIELLE D. BOUTIN
15 Deputy Attorneys General
16 *Attorneys for Defendants Rob Bonta,*
in his official capacity as California
17 *Attorney General, and Blake*
Graham, in his official capacity as
18 *Acting Director of the Department of*
Justice Bureau of Firearms

19
20 Dated: September 28, 2022

Respectfully submitted,
21 */s/ Raymond M. DiGuiseppe*
The DiGuiseppe Law Firm, P.C.
22 Raymond M. DiGuiseppe
23 CA State Bar No. 228457
24 4320 Southport-Supply Road
25 Suite 300
26 Southport, NC 28461
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STIPULATION

1
2 Plaintiffs and Defendants stipulate as follows:

3 WHEREAS, Plaintiffs filed their Second Amendment Complaint for
4 Declaratory and Injunction Relief, ECF No. 49 (“SAC”), in this action on August
5 22, 2022;

6 WHEREAS, the fourth through seventh claims in the SAC challenge the
7 constitutionality of section 2 of Senate Bill 1327, codified in California Code of
8 Procedure section 1021.11 (“Section 1021.11”);

9 NOW THEREFORE,

10 1. Defendants agree that they will not seek to recover attorneys’ fees or
11 costs against any of the Plaintiffs, any of their attorneys, or any of their attorney’s
12 law firms pursuant to Section 1021.11 in connection with this action. This
13 stipulation does not affect Defendants’ rights to seek to recover attorneys’ fees or
14 costs pursuant to any other legal authority. This stipulation also does not affect
15 Defendants’ rights to seek to recover attorneys’ fees and costs incurred in any other
16 lawsuit.

17 2. All Plaintiffs agree to promptly dismiss the fourth through seventh claims
18 in the SAC. Plaintiffs Renna, Jaymes, Laura Schwartz, Michael Schwartz,
19 Macomber, Freeman, Klier, Smith, Phillips, Cheryl Prince, Darin Prince, Ryan
20 Peterson, and Leonard Ruebe agree to dismiss the fourth through seventh claims
21 with prejudice. The remaining Plaintiffs may dismiss the fourth through seventh
22 claims without prejudice.

23 IT IS SO STIPULATED.
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1 Dated: September 28, 2022

Respectfully submitted,

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ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

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/s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
Deputy Attorneys General
Attorneys for Defendants Rob Bonta,
in his official capacity as California
Attorney General, and Blake
Graham, in his official capacity as
Acting Director of the Department of
Justice Bureau of Firearms

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12 Dated: September 28, 2022

Respectfully submitted,

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/s/ Raymond M. DiGuiseppe
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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: September 28, 2022

/s/ Gabrielle D. Boutin
Gabrielle D. Boutin

CERTIFICATE OF SERVICE

Case Name: **Lana Rae Renna et al. v. Xavier** No. **3:20-cv-02190-DMS-DEB**
Becerra et al.

I hereby certify that on September 28, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**JOINT MOTION AND STIPULATION REGARDING PLAINTIFFS' CLAIMS
CHALLENGING SENATE BILL 1327**

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 28, 2022, at Sacramento, California.

Ritta Mashriqi
Declarant

/s/Ritta Mashriqi
Signature