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B&L PRODUCTIONS, INC., d/b/a
CROSSROADS OF THE WEST; et al.,

Plaintiffs,

v.

GAVIN NEWSOM, in his official
capacity as Governor of the State of
California; et al.;

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 & REQUEST FOR
SCHEDULING ORDER**

Action Filed: August 12, 2022

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8 *Attorneys for Defendants Governor Gavin Newsom,*
Attorney General Rob Bonta, Secretary Karen Ross,
9 *and 32nd District Agricultural Association*

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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 B
3 & L Productions, Inc., d/b/a Crossroads of the West, Gerald Clark, Eric Johnson,
4 Chad Littrell, Jan Steven Merson, California Rifle & Pistol Association,
5 Incorporated, Second Amendment Law Center, Inc., Asian Pacific American Gun
6 Owners Association, and Second Amendment Foundation, Inc. (collectively,
7 “Plaintiffs”) and Defendants Gavin Newsom, in his official capacity as Governor of
8 the State of California, Rob Bonta, in his official capacity as Attorney General of the
9 State of California, Karen Ross, in her official capacity as Secretary of California
10 Department of Food and Agriculture and in her personal capacity, and the 32nd
11 District Agricultural Association (collectively, “Stipulating Defendants” and
12 together with Plaintiffs, the “Stipulating Parties”), by and through their attorneys,
13 hereby stipulate and jointly move to the following below.¹

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

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

20 WHEREAS, the Stipulating Parties previously stipulated to extend the
21 deadline for the Stipulating Defendants to file their response to Plaintiffs’ Complaint
22 by more than 30 days (ECF No. 14);

23 WHEREAS, this Court approved that stipulation, ordering that the Stipulating
24 Defendants file their response on or before November 14, 2022;

25 WHEREAS, since the filing and approval of that stipulation, Plaintiffs learned

26
27 ¹ Defendant Todd Spitzer, sued in his official capacity as the District Attorney of
28 Orange County, is not a party to this stipulation and is represented by separate
counsel.

1 of the recent adoption of California Senate Bill 915 (SB 915), a statewide law,
2 effective January 1, 2023, which restricts the sales of firearms, ammunition, and
3 firearm precursor parts on state property and buildings that sit on state property,
4 subject to exceptions;

5 WHEREAS, on or about November 1, 2022, counsel for the Stipulating
6 Parties met and conferred to discuss the Stipulating Defendants' anticipated motion
7 to dismiss Plaintiffs' Complaint;

8 WHEREAS, during that meeting, Plaintiffs informed the Stipulating
9 Defendants that they will file a First Amended Complaint to bring a challenge to SB
10 915, add a Second Amendment claim, and attempt to address concerns raised by the
11 Stipulating Defendants during the meet-and-confer process;

12 WHEREAS, Plaintiffs also informed the Stipulating Defendants that they
13 anticipate promptly filing a motion for preliminary injunction to be heard before SB
14 915 takes effect on January 1, 2023;

15 WHEREAS, the issues concerning Plaintiffs' anticipated motion for a
16 preliminary injunction will significantly overlap with any potential motion to
17 dismiss or other response to the First Amended Complaint, the Stipulating Parties
18 agree that it would preserve resources of both the parties and the Court to again
19 extend the deadline for the Stipulating Defendants to file any responsive pleading.

20 NOW THEREFORE, in consideration of the foregoing, the Stipulating Parties
21 stipulate and jointly move as follows:

- 22 1. Plaintiffs are to file and serve the First Amended Complaint on or
23 before November 11, 2022;
- 24 2. Plaintiffs are to file and serve any motion for preliminary injunction on
25 or before November 15, 2022;
- 26 3. Stipulating Defendants are to file and serve any opposition to the
27 motion for preliminary injunction on or before December 9, 2022;
- 28 4. Plaintiffs are to file and serve any reply to the opposition to the motion

1 for preliminary injunction on or before December 16, 2022;

2 5. The hearing on Plaintiffs’ motion for preliminary injunction will be set
3 for December 30, 2022, at 9:00 a.m., or any date thereafter convenient for the Court.

4 6. The Stipulating Defendants’ time to answer, move to dismiss, or
5 otherwise respond to the First Amended Complaint shall be extended until sixty (60)
6 days after the hearing on Plaintiffs’ motion for preliminary injunction, or 30 days
7 after the ruling on the motion for preliminary injunction is issued, whichever is later.

8 **IT IS SO STIPULATED.**

9
10 Dated: November 8, 2022

MICHEL & ASSOCIATES, P.C.

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

16 Dated: November 8, 2022

LAW OFFICES OF DONALD KILMER, APC

17 /s/ Donald Kilmer
18 Donald Kilmer
19 Counsel for Plaintiff Second Amendment
Foundation

20 Dated: November 8, 2022

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

24 /s/ Nicole J. Kau
25 Deputy Attorney General
26 Counsel for Defendants Governor Gavin
27 Newsom, Attorney General Rob Bonta,
28 Secretary Karen Ross, and 32nd District
Agricultural Association

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ATTESTATION OF E-FILED SIGNATURES

I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this STIPULATION AND JOINT MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT BY MORE THAN 30 DAYS & REQUEST FOR SCHEDULING ORDER. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: November 8, 2022

/s/ Anna M. Barvir
Anna M. Barvir

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

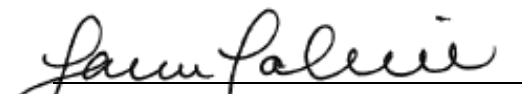
**STIPULATION AND JOINT MOTION TO EXTEND TIME TO RESPOND
TO THE COMPLAINT BY MORE THAN 30 DAYS AND REQUEST FOR
SCHEDULING ORDER**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Nicole J. Kau, Deputy Attorney General
nicole.kau@doj.ca.gov
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230

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

Executed November 8, 2022.



Laura Palmerin