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6 Incorporated, Gerald Clark, Eric Johnson, Chad Littrell, Jan Steven Merson, Asian
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10 Attorney for Plaintiff Second Amendment Foundation

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

13 B&L PRODUCTIONS, INC., d/b/a
14 CROSSROADS OF THE WEST;
15 GERALD CLARK; ERIC JOHNSON;
16 CHAD LITRELL; JAN STEVEN
17 MERSON; CALIFORNIA RIFLE &
18 PISTOAL ASSOCIATION,
19 INCORPORATED; ASIAN PACIFIC
AMERICAN GUN OWNERS
ASSOCIATION; SECOND
AMENDMENT LAW CENTER, INC.;

20 Plaintiffs,

21 v.

22 GAVIN NEWSOM, in his official
23 capacity as Governor of the State of
24 California; ROB BONTA, in his official
25 capacity as Attorney General of the
26 State of California; KAREN ROSS, in
27 her official capacity as Secretary of
California Department of Food &
Agriculture and in his personal capacity;
TODD SPITZER, in his official capacity
as District Attorney of Orange County;
32nd DISTRICT AGRICULTURAL
ASSOCIATION; DOES 1-10;

28 Defendants.

CASE NO.: 8:22-cv-01518 JWH (JDEx)

**NOTICE OF PLAINTIFFS' MOTION
AND MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: January 6, 2023
Hearing Time: 9:00 a.m.
Courtroom: 9D
Judge: John W. Holcomb

Action Filed: August 12, 2022

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is hereby given that on January 6, 2023, at 9:00 a.m. in Courtroom 9D
3 of the above-captioned court, located at 411 W. 4th Street, Santa Ana, California
4 92701-4516, Plaintiffs B&L Productions, Inc., Gerald Clark, Eric Johnson, Chad
5 Littrell, Jan Steven Merson, California Rifle & Pistol Association, Incorporated,
6 Asian Pacific American Gun Owner Association, Second Amendment Law Center,
7 Inc., and the Second Amendment Foundation (collectively, “Plaintiffs”) will move
8 for a preliminary injunction under Rule 65(a) of the Federal Rules of Civil
9 Procedure. Specifically, Plaintiffs will seek an order temporarily enjoining the
10 enforcement of California Penal Code sections 27573 and 27575 during the
11 pendency of this action.

12 Plaintiffs also ask this Court to order Defendant 32nd District Agricultural
13 Association, upon request by Plaintiff B&L Productions, to make available the next
14 available date for a gun show and allow Crossroads to reserve dates for gun show
15 events (and to hold such events) at the Fairgrounds as the District would any other
16 event promoters who have previously held events at the Fairgrounds.

17 Plaintiffs bring this motion because sections 27573 and 27575 violates
18 Plaintiffs’ rights to free speech, association, and assembly protected by the First
19 Amendment, as well as their right to equal protection under the law protected by the
20 Fourteenth Amendment and their right to buy and sell lawful arms for lawful
21 purposes under the Second Amendment. Unless this Court orders the requested
22 preliminary relief, Plaintiffs will continue to suffer actual and substantial irreparable
23 harm as described in Plaintiffs’ memorandum of points and authorities.

24 This application is made on the grounds set forth in the accompanying
25 memorandum of points and authorities, the signed declarations of Carl Dawson
26 Michel, Anna M. Barvir, Gerald Clark, Alan Gottlieb, Eric Johnson, Chad Littrell,
27 Patrick Lopez, Jan Steven Merson, Richard Minnich, and Tracy Olcott, the request
28 for judicial notice, all pleadings and papers filed in this action, the argument of

1 counsel, and further evidence as the Court may consider at or before the hearing on
2 this motion.

3 Dated: November 16, 2022

MICHEL & ASSOCIATES, P.C.

/s/ Anna M. Barvir

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

8 Dated: November 16, 2022

LAW OFFICES OF DONALD KILMER, APC

/s/ Donald Kilmer

Donald Kilmer
Counsel for Plaintiff Second Amendment
Foundation

12
13 **ATTESTATION OF E-FILED SIGNATURES**

14 I, Anna M. Barvir, am the ECF User whose ID and password are being used
15 to file this NOTICE OF PLAINTIFFS’ MOTION AND MOTION FOR
16 PRELIMINARY INJUNCTION. In compliance with Central District of California
17 L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have
18 concurred in this filing.

19 Dated: November 16, 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:

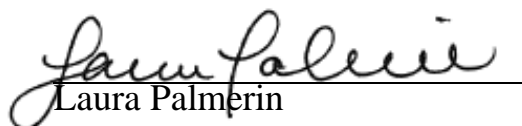
NOTICE OF PLAINTIFFS’ MOTION AND MOTION FOR PRELIMINARY INJUNCTION

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
Attorney for Defendants

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

Executed November 16, 2022.



Laura Palmerin