

1 C.D. Michel – SBN 144258
cmichel@michellawyers.com
2 Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
3 Alexander A. Frank – SBN 311718
afrank@michellawyers.com
4 Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
5 MICHEL & ASSOCIATES, P.C.
180 E. Ocean Boulevard, Suite 200
6 Long Beach, CA 90802
Telephone: (562) 216-4444
7 Facsimile: (562) 216-4445

8 Attorneys for Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome Schammel,
and California Rifle & Pistol Association, Incorporated
9

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SOUTHERN DIVISION**

13 LANCE BOLAND, an individual;
14 MARIO SANTELLAN, an individual;
15 RENO MAY, an individual; JEROME
16 SCHAMMEL, an individual; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED, a
California corporation,

17 Plaintiffs,

18 v.

19 ROBERT BONTA, in his official
20 capacity as Attorney General of the State
of California; and DOES 1-10,

21 Defendants.
22

CASE NO.: 8:22-cv-01421-CJC(ADSx)

**STIPULATION TO DISMISS
SECOND CLAIM FOR RELIEF
WITH PREJUDICE**

23 **STIPULATION**

24 WHEREAS, Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome
25 Schammel, and California Rifle & Pistol Association, Incorporated, have agreed with
26 Defendant Robert Bonta to dismiss WITH PREJUDICE the claim for relief in the
27 operative complaint entitled Second Claim for Relief for Unconstitutional Discrimination
28 Against Interstate Commerce, in consideration for Defendant waiving any claim for

1 attorney's fees and costs of suit under California Code of Civil Procedure section 1021.11
2 arising from such dismissal; and

3 WHEREAS, Plaintiffs will effectuate such dismissal by this stipulation and by
4 filing within the time limits allowed under FED R. CIV. P. 15 an amended pleading (as
5 extended by prior stipulation and order) reflecting that such claim has been dismissed;

6 THEREFORE, the Parties hereby stipulate to such dismissal and request that the
7 Court enter a dismissal with prejudice of Plaintiffs' Second Claim for Relief as to all
8 Defendants.

9 Respectfully Submitted,

10
11 Dated: September 22, 2022

MICHEL & ASSOCIATES, P.C.

12 /s/ C.D. Michel
13 C.D. Michel
14 Counsel for Plaintiffs
e-mail: cmichel@michellawyers.com

15 Dated: September 22, 2022

16 ROB BONTA
17 Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General

18 /s/ Robert L. Meyerhoff
19 ROBERT L. MEYERHOFF
20 Deputy Attorney General

21 *Attorneys for Rob Bonta in his official*
22 *capacity as Attorney General for the*
23 *State of California*

CERTIFICATE OF SERVICE

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Boland, et al. v. Bonta*

Case No.: 8:22-cv-01421-CJC(ADSx)

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 TO DISMISS SECOND CLAIM FOR RELIEF WITH
PREJUDICE**

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

Robert L. Meyerhoff, Deputy Attorney General
robert.meyerhoff@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 September 22, 2022.


Christina Castron