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14 **IN THE UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 CALIFORNIA RIFLE & PISTOL
18 ASSOCIATION, INCORPORATED;
19 SECOND AMENDMENT
FOUNDATION; GUN OWNERS OF
CALIFORNIA, INC,

20 Plaintiffs,

21 v.

22 CITY OF GLENDALE; GLENDALE
23 CHIEF OF POLICE CARL
POVILAITIS, in his official capacity;
24 GLENDALE CITY CLERK SUZIE
ABAJIAN, in her official capacity; and
25 DOES 1-10,

26 Defendants.

CASE NO: 2:22-cv-07346-SB-JC

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

Hearing Date: December 2, 2022

Hearing Time: 8:30 a.m.

Courtroom: 6C

Judge: Hon. Stanley Blumenfeld Jr.

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

2 Notice is hereby given that on December 2, 2022, at 8:30 a.m. in Courtroom
3 6C of the above-captioned court, located at 350 West 1st Street in Los Angeles,
4 California 90012, Plaintiffs California Rifle & Pistol Association, Second
5 Amendment Foundation, and Gun Owners of California, Inc. (collectively,
6 “Plaintiffs”) will move for a preliminary injunction under Rule 65(a) of the Federal
7 Rules of Civil Procedure. Specifically, Plaintiffs will seek an order temporarily
8 enjoining Defendants, their employees, agents, successors in office, and all other
9 public officials or law enforcement officers in the City of Glendale, from enforcing
10 Glendale Municipal Code § 9.25.050, subd. (A) against any individuals with
11 concealed handgun licenses issued pursuant to California Penal Code sections
12 26150 or 26155.

13 Plaintiffs bring this motion because Glendale Municipal Code § 9.25.050,
14 subd. (A) violates the rights of Plaintiffs’ members with concealed handgun
15 licenses in two major ways: it prohibits them from carrying the firearms in non-
16 sensitive places just because those places are city-owned or operated; and it denies
17 them due process by not requiring such places to post signs notifying them that
18 guns are not allowed on the property.

19 This application is made on the grounds set forth in the accompanying
20 memorandum of points and authorities; the signed declarations of Alan Gottlieb,
21 Richard Minnich, and Sam Paredes; the accompanying request for judicial notice;
22 all pleadings and papers filed in this action, the argument of counsel, and further
23 evidence as the Court may consider before ruling on the preliminary injunction
24 requested herein.

1 Respectfully Submitted,

2 Dated: October 20, 2022

MICHEL & ASSOCIATES, P.C.

/s/ C.D. Michel

C.D. Michel
Counsel for Plaintiffs California Rifle & Pistol
Association, Incorporated and Gun Owners of
California, Inc.

7
8 Dated: October 20, 2022

LAW OFFICES OF DON KILMER

/s/ Don Kilmer

Don Kilmer
Counsel for Plaintiff Second Amendment
Foundation