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 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 11 CIVIL DIVISION

13 **SOUTH BAY ROD & GUN CLUB,**
 14 **INC., et al.,**
 15 Plaintiffs,
 16 v.
 17 **ROBERT BONTA, et al.,**
 18 Defendants.
 19

3:22-cv-01461-BEN-JLB

**JOINT MOTION AND
 STIPULATION REGARDING
 EXTENSION OF TIME FOR
 DEFENDANT BONTA TO
 RESPOND TO COMPLAINT**

Judge: Hon. Roger T. Benitez
 Courtroom: 5A
 Action Filed: September 28, 2022

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1 Defendant Attorney General Rob Bonta and Plaintiffs (“the Parties”)
2 respectfully submit this motion in accordance with Civil Rules 7.2 and 12.1 for an
3 order extending the time for Defendant Attorney General Rob Bonta to respond to
4 the Complaint. Defendant requests an extension from **October 21, 2022 to 30 days**
5 **after the court enters an order on Plaintiffs’ Preliminary Injunction Motion**
6 **(Doc. 10)**.

7 Good cause exists to grant the requested extension. Defendant requires more
8 time to analyze the Complaint and to consider and prepare his response.
9 Additionally, good cause exists because preparation of a response would require a
10 substantial expenditure of time and effort—one that may not be wholly necessary if
11 preliminary injunction proceedings narrow the issues. Thus, it would be more
12 efficient for the parties and the court to focus on the preliminary injunction issues
13 before requiring Defendant to respond to the Complaint.

14 For these reasons, the Parties move the Court to issue an order granting the
15 requested extension.

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1 Dated: October 21, 2022

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Respectfully submitted,

Rob Bonta
Attorney General of California
P. Patty Li
Supervising Deputy Attorney
General

s/ Elizabeth K. Watson
Elizabeth K. Watson
Deputy Attorney General
Attorneys for Defendant Rob Bonta

s/ C.D. Michel
C.D. Michel
Counsel for Plaintiffs

s/ Don Kilmer
Don Kilmer
Counsel for Plaintiffs

STIPULATION

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3 Defendant Attorney General Rob Bonta and Plaintiffs (“the Parties”), by and
4 through their counsel hereby stipulate and agree as follows:

5 **WHEREAS**, Plaintiffs have filed a motion for preliminary injunction (Doc.
6 10); and
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8 **WHEREAS**, good cause exists to grant the requested extension because
9 Defendant requires more time to analyze the Complaint and to consider and prepare
10 his response; and
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12 **WHEREAS**, good cause also exists because preparation of an answer to all
13 allegations would require a substantial expenditure of time and effort—one that
14 may not be wholly necessary if preliminary injunction proceedings narrow or
15 resolve the issues;
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17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by
18 the Parties as follows:
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- 20
21 1. Defendant Attorney General Rob Bonta’s time to respond to the
22 Complaint shall be extended from October 21 to 30 days after the court
23 issues an order on Plaintiffs’ Motion for Preliminary Injunction (Doc.
24 10).
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26 **IT IS SO STIPULATED AND AGREED.**
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1 Dated: October 21, 2022

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Respectfully submitted,

Rob Bonta
Attorney General of California
P. Patty Li
Supervising Deputy Attorney
General

s/ Elizabeth K. Watson
Elizabeth K. Watson
Deputy Attorney General
Attorneys for Defendant Rob Bonta

s/ C.D. Michel
C.D. Michel
Counsel for Plaintiffs

s/ Don Kilmer
Don Kilmer
Counsel for Plaintiffs

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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: October 21, 2022

s/ Elizabeth K. Watson

Elizabeth K. Watson
Deputy Attorney General
Attorney for Defendants

CERTIFICATE OF SERVICE

Case Name: South Bay Rod & Gun Club,
Inc., et al. v. Rob Bonta

Case No. 3:22-cv-01461-JO-WVG

I hereby certify that on October 21, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **JOINT MOTION AND STIPULATION REGARDING EXTENSION OF TIME FOR DEFENDANT BONTA TO RESPOND TO COMPLAINT**
- **ELIZABETH WATSON'S DECLARATION IN SUPPORT OF MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO COMPLAINT**

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 October 21, 2022, at San Francisco, California.

B. Chung
Declarant


Signature

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