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15 Second Amendment Law Center, and California Rifle and Pistol Association,
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24 **UNITED STATES DISTRICT COURT**
25 **SOUTHERN DISTRICT OF CALIFORNIA**

26 SOUTH BAY ROD & GUN CLUB,
27 INC.; GARY BRENNAN, an
28 individual; CORY HENRY, an
individual; PATRICK LOVETTE, an
individual; VIRGINIA DUNCAN, an
individual; RANDY RICKS, an
individual; CITIZENS COMMITTEE
FOR THE RIGHT TO KEEP AND
BEAR ARMS; GUN OWNERS OF
CALIFORNIA; SECOND
AMENDMENT LAW CENTER; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

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

Defendants.

CASE NO: 3:22-cv-01461-RBM-WVG
REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF PLAINTIFFS’
REPLY BRIEF ON THEIR MOTION
FOR PRELIMINARY INJUNCTION

Hearing Date: November 21, 2022
Courtroom: 5B
Judge: Hon. Roger T. Benitez

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

2 Under Federal Rule of Evidence 201 Plaintiffs respectfully request that the
3 Court take judicial notice of the following documents or facts in support of
4 Plaintiffs' Reply Brief on their Motion for Preliminary Injunction:

5 1. **Stipulation to Dismiss Second Claim for Relief with Prejudice** –
6 filed in *Lance Boland, et al. v. Robert Bonta*, Case No. 8:22-cv-01421 (C.D. Cal.).
7 A true and correct copy of this document is attached to Plaintiffs' Reply Brief (Dkt
8 No. 16) as **Exhibit A**.

9 2. **Order Re: Stipulation to Dismiss Second Claim for Relief with**
10 **Prejudice** - filed in *Lance Boland, et al. v. Robert Bonta*, Case No. 8:22-cv-01421
11 (C.D. Cal.). A true and correct copy of this document is attached to Plaintiffs'
12 Reply Brief (Dkt No. 20) as **Exhibit B**.

13 3. Plaintiffs request this Court take notice of the existence of *Lance*
14 *Boland, et al. v. Robert Bonta*, Case No. 8:22-cv-01421, currently pending in the
15 Central District of California. In that case, several plaintiffs, including Plaintiff
16 California Rifle & Pistol Association, Incorporated ("CRPA"), challenge
17 California's Unsafe Handgun Act.

18 4. Plaintiffs request this Court take notice of the existence of *B&L*
19 *Productions, Inc., et al. v. Gavin Newsom, et al.*, Case No. 8:22-cv-01518,
20 currently pending in the Central District of California. In that case, Plaintiff CRPA
21 has joined several other plaintiffs in challenging restrictions on the use of public
22 property for gun shows.

23 5. Plaintiffs request this Court take notice of the existence of *California*
24 *Rifle & Pistol Association, Incorporated, et al. v. City of Glendale, et al.*, Case
25 No. 2:22-cv-07346, currently pending in the Central District of California. In that
26 case, Plaintiffs CRPA and Gun Owners of California (as well as Second
27 Amendment Foundation, a Plaintiff in the parallel *Miller II* matter) have recently
28 filed suit against the City of Glendale to challenge its restrictions on gun possession

1 on all city property.

2 Federal Rule of Evidence 201 allows the Court to notice a fact if it is not
3 subject to reasonable dispute such that it is generally known or can be accurately
4 and readily determined from sources whose accuracy cannot reasonably be
5 questioned. A court shall take judicial notice of such a fact if requested by a party
6 and supplied with the necessary information. FED. R. EVID. 201(d). In addition, the
7 Court may take judicial notice of court records. *Brooks v. Y.Y.G.M. SA*, No. 2:21-
8 cv-00078, 2021 U.S. Dist. LEXIS 225412, at *2-3 (E.D. Cal. Nov. 22, 2021) (citing
9 *BP W. Coast Prods. LLC v. Greene*, 318 F. Supp. 2d 987, 994 (E.D. Cal. 2004)).

10 Here, Plaintiffs request judicial notice of the existence of three matters in
11 which some Plaintiffs in this action are also plaintiffs in other pending cases
12 challenging gun laws in California. In addition, Plaintiffs request judicial notice of
13 documents filed in one of those matters. The accuracy of these documents cannot
14 reasonably be questioned. Judicial notice of these records is therefore appropriate.

15 Respectfully submitted,

16 Dated: November 7, 2022

MICHEL & ASSOCIATES, P.C.

18 /s/ C.D. Michel
19 For Plaintiffs South Bay Rod & Gun Club,
20 Inc. Gary Brennan, Cory Henry, Patrick
21 Lovette, Virginia Duncan, Randy Ricks, Gun
Owners of California, Second Amendment
Law Center, and California Rifle and Pistol
Association, Incorporated

Law Offices of Donald Kilmer, APC

23 /s/ Don Kilmer
24 For Plaintiff Citizens Committee for the
25 Right to Keep and Bear Arms

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**CERTIFICATE OF SERVICE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Case Name: *South Bay Rod & Gun Club, Inc. v. Bonta*
Case No.: 3:22-cv-01461-RBM-WVG

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States over 18 years of age. My business address is 180 East Ocean Boulevard, Suite 200 Long Beach, CA 90802. I am not a party to the above-entitled action.

I have caused service of the following documents, described as:

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS'
REPLY BRIEF ON THEIR MOTION FOR PRELIMINARY INJUNCTION**

on the following parties by electronically filing the foregoing on November 7, 2022 with the Clerk of the District Court using its ECF System, which electronically notifies them.

Elizabeth Watson
Elizabeth.Watson@doj.ca.gov
Ryan Richard Davis
Ryan.Davis@doj.ca.gov
1300 I Street, Suite 125
Sacramento, CA 95814

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 7, 2022, at Long Beach, CA.

/s/Christina Castron
CHRISTINA CASTRON