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

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

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

Plaintiffs,

v.

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

Defendants.

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

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

Hearing Date: December 19, 2022

Hearing Time: 1:30 p.m.

Courtroom: 6B

Judge: Honorable Cormac J. Carney

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Notice is hereby given that on December 19, 2022, at 1:30 p.m. in Courtroom 6B
of the above-captioned court, located at 411 West 4th Street, Santa Ana, CA 92701,
Plaintiffs will move for a preliminary injunction under Rule 65(a) of the Federal Rules of
Civil Procedure. Specifically, Plaintiffs will seek an order temporarily enjoining

1 Defendant Attorney General Robert Bonta and his agents, servants, employees, and those
2 working in active concert with him, from enforcing or giving effect to California Penal
3 Code sections 31900 through 32110 during the pendency of this action.

4 Plaintiffs bring this motion because Sections 31900 through 32110 violate
5 Plaintiffs' Second Amendment right to possess hundreds of models of handguns that are
6 popular and commonly used for self defense and other lawful purposes throughout the
7 nation. Unless this Court orders the requested preliminary relief, Plaintiffs and the
8 general California public will continue to suffer this unnecessary and significant
9 infringement of their constitutional rights.

10 This motion is based on this Notice of Motion and Motion, the Memorandum of
11 Points and Authorities filed in support, the supporting Declarations of Lance Boland,
12 Mario Santellan, Reno May, Jerome Schammel, and Richard Minnich, the Request for
13 Judicial Notice filed in support, as well as any exhibits attached thereto. This motion is
14 also based on the pleadings and records already on file, and on any further matters the
15 Court deems appropriate.

16 Dated: November 15, 2022

MICHEL & ASSOCIATES, P.C.

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18 /s/C.D. Michel

C.D. Michel

19 Attorneys for Plaintiffs Lance Boland,
20 Mario Santellan, Reno May, Jerome
21 Schammel, and California Rifle &
22 Pistol Association, Incorporated
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