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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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13 **LANCE BOLAND, AN INDIVIDUAL;**
14 **MARIO SANTELLAN, AN**
INDIVIDUAL; RENO MAY, AN
15 **INDIVIDUAL, JEROME**
SCHAMMEL, AN INDIVIDUAL; AND
16 **CALIFORNIA RIFLE & PISTOL**
ASSOCIATION,
17 **INCORPORATED, A CALIFORNIA**
CORPORATION;

18 Plaintiffs,

19 v.

20 **ROBERT BONTA, IN HIS OFFICIAL**
21 **CAPACITY AS ATTORNEY GENERAL**
OF CALIFORNIA,

22 Defendant.
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Case No. 8:22-cv-01421-CJC-ADS

STIPULATION TO EXTEND TIME
RE: PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

Courtroom: 9B
Judge: Hon. Cormac J. Carney
Action Filed: August 1, 2022

1 Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome Schammel, and
2 California Rifle & Pistol Association, Inc. (Plaintiffs) and Defendant Rob Bonta in
3 his official capacity as Attorney General of California (Defendant, and together
4 with Plaintiff, the Parties) hereby stipulate and agree as follows:

5 **WHEREAS**, on August 1, 2022, Plaintiffs filed their Original Complaint
6 (Dkt. 1) in this matter;

7 **WHEREAS**, on September 23, 2022, Plaintiffs filed their First Amended
8 Complaint (the FAC) (Dkt. 17);

9 **WHEREAS**, on October 7, 2022, Defendant filed his answer to the FAC;

10 **WHEREAS**, on November 15, 2022, Plaintiffs filed a Motion for Preliminary
11 Injunction (the Motion) (Dkt. 23), setting hearing on the Motion for December 19,
12 2022;

13 **WHEREAS**, under the current schedule, the deadline for Defendant to file a
14 response to the Motion is November 28, 2022, and thus Defendant's counsel would
15 be required to prepare the response on a short time frame and over the
16 Thanksgiving holiday;

17 **WHEREAS**, Defendant requested that Plaintiffs agree to continue the
18 deadline to respond to Plaintiffs' motion to December 5, 2022, to continue the
19 deadline for Plaintiffs to file their reply in support of their Motion to December 12,
20 2022, and to (in the Court's discretion) either hear the Motion on December 19,
21 2022 or continue the hearing on the Motion to January 9, 2023;

22 **WHEREAS**, Plaintiff agreed to continue the deadline on Defendant's
23 response to the Motion and Plaintiffs' reply in support of the motion but not the
24 hearing date on the Motion;

25 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the
26 Parties that, with the Court's permission, the deadline for Defendant's response to
27 the Motion is hereby continued to December 5, 2022, the deadline for Plaintiffs'
28

1 reply in support of the Motion is hereby continued to December 19, 2022, and the
2 hearing on the Motion remains December 19, 2022, or, over Plaintiffs' objection, is
3 hereby continued to January 9, 2022.

4
5 Dated: November 17, 2022

Respectfully submitted,

6 ROB BONTA
7 Attorney General of California
8 MARK R. BECKINGTON
9 Supervising Deputy Attorney General

10 /s/ Robert L. Meyerhoff
11 ROBERT L. MEYERHOFF
12 Deputy Attorney General

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

13
14 Dated: November 17, 2022

Respectfully submitted,

15 /s/ Joshua Robert Dale
16 C.D. MICHEL
17 JOSHUA ROBERT DALE
18 ALEXANDER A. FRANK
19 KONSTADINOS T. MOROS

Michel & Associates, P.C.

20 *Attorneys for Plaintiffs Lance Boland,
21 Mario Santellan, Reno May, Jerome
22 Schammel, and the California Rifle &
23 Pistol Association, Incorporated*
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OF CALIFORNIA,

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Case No. 8:22-cv-01421-CJC-ADS

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME
RE: PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Courtroom: 9B
Judge: Hon. Cormac J. Carney
Action Filed: August 1, 2022

1 The Court, having considered the Stipulation to Extend Time re: Plaintiffs'
2 Motion for Preliminary Injunction, hereby GRANTS the Parties' request to
3 continue the deadline for Defendant to respond to the Motion to December 5, 2022,
4 and to continue the deadline for Plaintiffs to file their reply in support of the Motion
5 to December 12, 2022.

6 The Court further GRANTS the Parties' request to still hear the Motion on
7 December 19, 2022.

8 In the alternative, the Court further GRANTS Defendant's request to
9 continue the hearing on the Motion to January 9, 2023.

10 **IT IS SO ORDERED.**

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12
13 Dated: _____

14 Hon. Cormac J. Carney
15 U.S. District Court Judge
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CERTIFICATE OF SERVICE

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

No. **8:22-cv-01421-CJC-ADS**

I hereby certify that on November 17, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION TO EXTEND TIME RE: PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION; and [PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME RE: PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

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 November 17, 2022, at Los Angeles, California.

Robert Leslie Meyerhoff

Declarant



Signature