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14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

16 MARK BAIRD and
17 RICHARD GALLARDO,

18 Plaintiffs,

19 v.

20 ROB BONTA, in his official capacity as
21 Attorney General of the State of California,
22 and DOES 1-10,

23 Defendants.

Case No. 2:19-CV-00617

**DECLARATION OF
AMY L. BELLANTONI IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
CONTINUANCE OF THE RETURN
DATE FOR PLAINTIFFS' SECOND
PRELIMINARY INJUNCTION MOTION**

Date: June 18, 2021
Time: 10:00 a.m.
Room: 3
Judge: Hon. Kimberly J. Mueller

DECLARATION OF AMY L. BELLANTONI

1. I am an attorney with The Bellantoni Law Firm, PLLC, attorneys of record for Plaintiffs, Mark Baird and Richard Gallardo. I am admitted to practice law before the United States District Court for the Eastern District of California, *pro hac vice*. I am also admitted to practice law before the Southern, Eastern, and Northern District Courts of the State of New York,

1 the Second Circuit Court of Appeals, the District Court of the District of Columbia, and United
2 States Supreme Court. I have personal knowledge of the facts set forth herein and, if called and
3 sworn as a witness, could and would testify competently thereto.

4 2. On June 15, 2021, I contacted counsel for Defendant Attorney General Xavier
5 Becerra, Deputy Attorney General R. Matthew Wise, Esq. by phone to meet and confer regarding
6 Plaintiffs' intention to file a motion for a continuance of the return date for Plaintiffs' Second
7 Motion for a Preliminary Injunction from June 18, 2021 to July 16, 2021.

8 3. There is good cause to extend this deadline. Within the past 2 weeks, Plaintiffs'
9 counsel was required to meet filing deadlines for 2 administrative appeals, a reply brief for a state
10 court appeal, drafting and filing an appeal in state court, drafting and filing 2 federal court
11 complaints in multi-plaintiff actions, one of which required the filing of a temporary restraining
12 order and supporting documents, and arguing an appeal in a state court proceeding. During the
13 same time period, I was out of the office sick for approximately 3 days.

14 4. Defendant's counsel has consented to the requested relief.

15
16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18
19 Dated: July 17, 2021

/s/ Amy L. Bellantoni

Amy L. Bellantoni, Esq.

Attorney for Plaintiffs

Pro Hac Vice

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