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 8 and 32nd District Agricultural Association*

9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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 13 **B&L PRODUCTIONS, INC., d/b/a
 14 CROSSROADS OF THE WEST, et
 15 al.,**

16 Plaintiffs,

17 v.

18 **GAVIN NEWSOM, et al.,**

19 Defendants.

8:22-cv-01518 JWH (JDEx)

**STIPULATION AND JOINT
 MOTION TO EXTEND TIME TO
 RESPOND TO THE FIRST
 AMENDED COMPLAINT BY
 MORE THAN 30 DAYS**

Courtroom: 9D
 Judge: The Honorable John W.
 Holcomb
 Action Filed: August 12, 2022

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 21 Pursuant to Local Rules 7-1 and 8-3 of the United States District Court for
 22 the Central District of California, Plaintiffs B & L Productions, Inc., d/b/a
 23 Crossroads of the West, Gerald Clark, Eric Johnson, Chad Littrell, Jan Steven
 24 Merson, California Rifle & Pistol Association, Incorporated, Second Amendment
 25 Law Center, Inc., Asian Pacific American Gun Owners Association, and Second
 26 Amendment Foundation, Inc. (collectively, "Plaintiffs") and Defendants Gavin
 27 Newsom, in his official capacity as Governor of the State of California, Rob Bonta,
 28 in his official capacity as Attorney General of the State of California, Karen Ross,

1 in her official capacity as Secretary of California Department of Food and
2 Agriculture, and the 32nd District Agricultural Association (collectively,
3 “Stipulating Defendants” and together with Plaintiffs, the “Stipulating Parties”), by
4 and through their attorneys, hereby stipulate and jointly move to the following
5 below:¹

6 WHEREAS, Plaintiffs’ Complaint (Doc No. 1) was filed in this Court on
7 August 12, 2022;

8 WHEREAS, Plaintiffs completed service of the Complaint and Summons on
9 the 32nd District Agricultural Association on August 29, 2022, the Attorney
10 General Rob Bonta on August 30, 2022, Karen Ross on August 31, 2022, and
11 Governor Gavin Newsom on September 13, 2022;

12 WHEREAS, the Stipulating Parties previously stipulated to extend the
13 deadline for the Stipulating Defendants to file their response to Plaintiffs’
14 Complaint by more than 30 days (Doc No. 14), and this was approved by the Court
15 (Doc No 15);

16 WHEREAS, since the filing and approval of that stipulation, Plaintiffs
17 learned of the recent adoption of California Senate Bill 915 (SB 915), a statewide
18 law, effective January 1, 2023, which restricts the sales of firearms, ammunition,
19 and firearm precursor parts on state property and buildings that sit on state property,
20 subject to exceptions;

21 WHEREAS, the Stipulating Parties met and conferred, on or about
22 November 1, 2022, regarding Plaintiffs’ intent to file a First Amended Complaint
23 and motion for preliminary injunction, and later filed a joint stipulation and motion
24 regarding Plaintiffs’ deadline to file the First Amended Complaint, the briefing
25 schedule for Plaintiffs’ motion for preliminary injunction, and the Stipulating
26 Defendants’ time to respond to the First Amended Complaint (Doc No. 16);

27 ¹ Defendant Todd Spitzer, sued in his official capacity as the District
28 Attorney of Orange County, is not a party to this stipulation and is represented by
separate counsel.

1 WHEREAS, the Court ordered in part that the hearing on Plaintiff’s motion
2 for preliminary injunction be set for January 6, 2023, and the Defendants’ deadline
3 to respond to the Complaint be extended to February 3, 2023 (Doc No. 20);

4 WHEREAS, after the parties submitted the motion for preliminary
5 injunction, opposition brief and reply brief, the Court issued an Order requesting
6 supplemental briefs and continued the hearing to February 10, 2023 (Doc No. 25);

7 WHEREAS, after the parties submitted the court-ordered supplemental
8 briefing, the Court issued an Order requesting additional supplemental briefs and
9 continued the hearing to April 6, 2023 (Doc. No. 28);

10 WHEREAS, the issues that will be decided by the Court on Plaintiffs’
11 motion for a preliminary injunction will significantly overlap with any potential
12 motion to dismiss or other response to the First Amended Complaint, and thus the
13 Stipulating Parties agree that it would preserve resources of both the parties and the
14 Court to again extend the deadline for the Stipulating Defendants to file any
15 responsive pleading.

16 NOW THEREFORE, in consideration of the foregoing, the Stipulating
17 Parties stipulate and jointly move as follows:

18 The Stipulating Defendants’ time to answer, move to dismiss, or otherwise
19 respond to the First Amended Complaint shall be extended until 21 days after the
20 Court issues its decision on Plaintiffs’ motion for preliminary injunction.

21 **IT IS SO STIPULATED.**

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Dated: February 1, 2023

MICHEL & ASSOCIATES, P.C.

/s/ Anna M. Barvier
Anna M. Barvir
Counsel for Plaintiffs B&L Productions, Inc.,
California Rifle & Pistol Association,
Incorporated, Gerald Clark, Eric Johnson, Chad
Littrell, Jan Steven Merson, Asian Pacific
American Gun Owner Association, Second
Amendment Law Center, Inc.

Dated: February 1, 2023

LAW OFFICES OF DONALD KILMER, APC

/s/ Donald Kilmer
Donald Kilmer
Counsel for Plaintiff Second Amendment
Foundation

Dated: February 1, 2023

ROB BONTA
Attorney General of California
R. MATTHEW WISE
Supervising Deputy Attorney General
NICOLE J. KAU
Deputy Attorney General

/s/ Nicole Kau
Deputy Attorney General
*Counsel for Defendants Governor Gavin
Newsom, Attorney General Rob Bonta,
Secretary Karen Ross, and 32nd District
Agricultural Association*

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CERTIFICATE OF SERVICE

Case **B&L Productions, Inc., et** No. **8:22-cv-01518 JWH**
Name: **al. v. Gavin Newsom, et al.** **(JDEx)**

I hereby certify that on February 1, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION AND JOINT MOTION TO EXTEND TIME TO RESPOND TO THE FIRST AMENDED COMPLAINT BY MORE THAN 30 DAYS

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 February 1, 2023, at Los Angeles, California.

Carol Chow
Declarant

/s/Carol Chow
Signature