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8 Attorneys for Defendants,
9 CITY OF GLENDALE, GLENDALE CHIEF OF
10 POLICE CARL POVILAITIS; and GLENDALE
11 CITY CLERK SUZIE ABAJIAN

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 CALIFORNIA RIFLE & PISTOL)
15 ASSOCIATION, INCORPORATED;)
16 SECOND AMENDMENT)
17 FOUNDATION; GUN OWNERS OF)
18 CALIFORNIA, INC.,)

19 Plaintiffs,)

20 vs.)

21 CITY OF GLENDALE; GLENDALE)
22 CHIEF OF POLICE CARL)
23 POVILAITIS, in his official capacity;)
24 GLENDALE CITY CLERK SUZIE)
25 ABAJIAN, in her official capacity; and)
26 DOES 1-10,)

27 Defendants.)
28)

Case No.: 2:22-cv-07346-SB-JC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT; [PROPOSED]
ORDER THEREON**

Complaint Served: October 18, 2022

Current Response Date: January 6,
2023

New Response Date: March 7, 2023

Hon. Stanley Blumenfeld Jr.

1 IT IS HEREBY STIPULATED, by and between Plaintiffs California Rifle & Pistol
2 Association, Incorporated, Second Amendment Foundation and Gun Owners of
3 California, Inc. (collectively “Plaintiffs”), and Defendants City of Glendale, Glendale
4 Chief of Police Carl Povilaitis, and Glendale City Clerk Suzie Abajian (collectively
5 “Defendants”), through their undersigned counsel, that Defendants may have a sixty (60)
6 day extension of time, up to and including March 7, 2023, to file an answer or otherwise
7 respond to Plaintiffs’ Complaint in the above-captioned action. Two prior extensions
8 totaling 59 days have previously been stipulated to by the parties.

9 Good cause exists to approve the instant stipulation as Defendants plan to file a
10 motion to dismiss which will incorporate many of the same arguments as Defendants’
11 anticipated opposition to Plaintiffs’ anticipated renewed motion for preliminary
12 injunction. The Court’s ruling on Plaintiffs’ renewed motion thus will likely narrow or
13 streamline many of the issues that will be raised in Defendants’ motion to dismiss which
14 is currently due prior to any hearing on Plaintiffs’ motion, and therefore approval of the
15 instant stipulation will promote judicial economy and conserve the Court’s and parties’
16 resources.

17 Additional good cause exists to grant the instant stipulation as the parties have been
18 meeting and conferring regarding the scope of Plaintiffs’ anticipated renewed motion for
19 preliminary injunction. During those conversations Plaintiffs have stated that they will
20 shortly be amending their complaint to add individual plaintiffs which would further
21 narrow the scope of Defendants’ planned motion to dismiss.

22
23 DATED: December 30, 2022

MICHEL & ASSOCIATES, P.C.

24
25 By: /s/Konstadinos T. Moros

Konstadinos T. Moros

Attorneys for Plaintiffs

26 California Rifle & Pistol Association and
27 Gun Owners of California, Inc.
28

1 DATED: December 30, 2022

MICHAEL J. GARCIA, CITY ATTORNEY

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4 By: 

EDWARD B. KANG
Attorneys for Defendants

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8 **ATTESTATION**

9 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories
10 listed, and on whose behalf the filing is submitted, concur in the filing's content and have
11 authorized the filing.
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