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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JASON WOLFORD; ALISON  
WOLFORD; ATOM KASPRZYCKI;  
HAWAII FIREARMS COALITION,

Plaintiffs,

v.

ANNE E. LOPEZ, in her official  
capacity as the Attorney General of the  
State of Hawai‘i,

Defendant.

Civil No. 1:23-cv-00265-LEK-WRP

**JOINT STIPULATION TO  
CONVERT TEMPORARY  
RESTRAINING ORDER TO  
PRELIMINARY INJUNCTION  
AND TO STAY FURTHER  
PROCEEDINGS IN THE DISTRICT  
COURT PENDING APPEAL**

District Judge:

Hon. Leslie E. Kobayashi

Magistrate Judge:

Hon. Wes Reber Porter

**JOINT STIPULATION TO CONVERT TEMPORARY RESTRAINING  
ORDER TO PRELIMINARY INJUNCTION AND TO STAY FURTHER  
PROCEEDINGS IN THE DISTRICT COURT PENDING APPEAL**

Pursuant to Local Rule 10.5, Plaintiffs Jason Wolford, Alison Wolford, Atom Kasprzycki, and Hawaii Firearms Coalition, and Defendant Anne E. Lopez, in her official capacity as the Attorney General of the State of Hawai‘i, by their respective counsel, hereby agree and stipulate that the District Court’s August 8, 2023, Order Granting in Part and Denying in Part Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction, Dkt. 66, shall be converted to a preliminary injunction, on the same basis and for the same reasons as those given in the August 8 Order. *See Washington v. Trump*, 847 F.3d 1151, 1159 n.3 (9th Cir. 2017) (per curiam). After the District Court converts the temporary

restraining order to a preliminary injunction, the parties shall, within forty-eight (48) hours, file a stipulated motion to voluntarily dismiss the appeal from the temporary restraining order, pursuant to Federal Rule of Appellate Procedure 42(b)(1), with each party responsible for bearing its own costs and fees in connection with that appeal. Defendant expressly reserves its right to appeal—and intends to appeal—the preliminary injunction. The parties agree that Defendant’s request that the temporary restraining order be stayed pending appeal shall be construed as a request that the preliminary injunction be stayed pending appeal. *See* Dkt. 67 (motion); *see also* Dkt. 79 (reply). The parties also agree that Plaintiffs’ opposition to Defendant’s request for a stay of the temporary restraining order, now construed as a request to stay the preliminary injunction, shall be construed as Plaintiffs’ opposition to Defendant’s request that the preliminary injunction be stayed pending appeal. *See* Dkt. 78 (opposition).

The parties hereby agree and stipulate that all further deadlines and proceedings in this Court will be stayed during the pendency of Defendant’s appeal from the preliminary injunction.

DATED: Washington, DC, September 6, 2023.

/s/ Ben Gifford

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*\* Pro Hac Vice*

*Attorneys for Defendant*

DATED: Honolulu, Hawai‘i, September 6, 2023.

/s/ Kevin O’Grady

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KEVIN GERARD O’GRADY  
ALAN ALEXANDER BECK

*Attorneys for Plaintiffs*

APPROVED AND SO ORDERED:

DATED: Honolulu, Hawai‘i, September 6, 2023



/s/ Leslie E. Kobayashi  
Leslie E. Kobayashi  
United States District Judge

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*Wolford et al. v. Lopez*, 1:23-cv-00265-LEK-WRP; JOINT STIPULATION TO  
CONVERT TEMPORARY RESTRAINING ORDER TO PRELIMINARY  
INJUNCTION AND TO STAY FURTHER PROCEEDINGS IN THE DISTRICT  
COURT PENDING APPEAL