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8 and 32nd District Agricultural Association*

*Exempt from Filing Fees Pursuant to
Government Code 6103.*

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12

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

8:22-cv-01518 JWH (JDEx)

**STATE DEFENDANTS' ANSWER
TO FIRST AMENDED
COMPLAINT**

16 Plaintiffs,

17 v.

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

Courtroom: 9D
Judge: The Honorable John W.
Holcomb

19 Defendants.
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Action Filed: August 12, 2022

21
22 Defendants Governor Gavin Newsom, Attorney General Rob Bonta,
23 Secretary Karen Ross of the California Department of Food and Agriculture, and
24 the 32nd District Agricultural Association (collectively, State Defendants), submit
25 their answer to response to the First Amended Complaint (FAC, ECF No. 19). The
26 State Defendants hereby answer the FAC in corresponding paragraphs, as follows:
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INTRODUCTION¹

1. Paragraph No. 1. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case, and no answer is required. To the extent that a response is required, the State Defendants admit that Plaintiff B&L Productions has operated gun shows in California for many years, including at the Orange County Fair & Event Center (the Fairgrounds), but deny each and every remaining allegation.

2. Paragraph No. 2. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case, and no answer is required. To the extent that a response is required, the State Defendants deny each and every allegation.

3. Paragraph No. 3. The State Defendants lack sufficient information or belief to respond to the factual allegations in this paragraph, and on that basis deny each and every allegation. The remaining allegations contain argument and legal contentions that speak for themselves and require no response by the State Defendants. To the extent that a response is required, the State Defendants deny these allegations.

4. Paragraph No. 4. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case, and no answer is required. To the extent that a response is required, the State Defendants lack sufficient information or belief to respond to the factual allegations in this paragraph, and on that basis deny each and every allegation. The State Defendants deny any remaining allegations.

5. Paragraph No. 5. This paragraph consists of allegations that contain Plaintiffs’ characterization of California statutes and legal argument, which speak for themselves, and no answer is required. To the extent that a response is required, the State Defendants admit that Governor Newsom signed Senate Bill 264 and

¹ For the convenience of the Court and the parties, the State Defendants utilize the same headings as set forth in the Complaint. The State Defendants neither admit nor deny any allegations that may be suggested by the headings.

1 Senate Bill 915 into law and that Defendant Bonta is the chief law enforcement
2 officer of the State. The State Defendants deny any remaining allegations.

3 6. Paragraph No. 6. This paragraph consists of allegations that contain
4 Plaintiffs' characterization of their case and legal argument, and no answer is
5 required. To the extent that a response is required, the State Defendants deny these
6 allegations.

7 7. Paragraph No. 7. This paragraph consists of allegations that contain
8 Plaintiffs' characterization of their case and legal argument, and no answer is
9 required. To the extent that a response is required, the State Defendants deny these
10 allegations.

11 **JURISDICTION AND VENUE**

12 8. Paragraph No. 8. The State Defendants admit that Plaintiffs purport to
13 bring claims under federal law, and this Court has jurisdiction over this action.

14 9. Paragraph No. 9. This paragraph consists of allegations that contain
15 Plaintiffs' characterization of their case and legal argument, and no answer is
16 required. To the extent that a response is required, the State Defendants deny each
17 and every allegation.

18 10. Paragraph No. 10. This paragraph consists of allegations that contain
19 Plaintiffs' characterization of their case and legal argument, and no answer is
20 required. To the extent that a response is required, the State Defendants deny each
21 and every allegation.

22 **PARTIES**

23 **[Plaintiffs]**

24 11. Paragraph No. 11. The State Defendant lack sufficient information or
25 belief to respond to the factual allegations in this paragraph, and on that basis deny
26 each and every allegation.

27 12. Paragraph No. 12. The State Defendant lack sufficient information or
28 belief to respond to the factual allegations in this paragraph, and on that basis deny

1 each and every allegation. The remaining allegations contain legal argument, and
2 no answer is required. To the extent that a response is required, the State
3 Defendants deny these allegations.

4 13. Paragraph No. 13. The State Defendant lack sufficient information or
5 belief to respond to the factual allegations in this paragraph, and on that basis deny
6 each and every allegation. The remaining allegations contain legal argument, and
7 no answer is required. To the extent that a response is required, the State
8 Defendants deny these allegations.

9 14. Paragraph No. 14. The State Defendant lack sufficient information or
10 belief to respond to the factual allegations in this paragraph, and on that basis deny
11 each and every allegation. The remaining allegations contain legal argument, and
12 no answer is required. To the extent that a response is required, the State
13 Defendants deny these allegations.

14 15. Paragraph No. 15. The State Defendant lack sufficient information or
15 belief to respond to the factual allegations in this paragraph, and on that basis deny
16 each and every allegation. The remaining allegations contain legal argument, and
17 no answer is required. To the extent that a response is required, the State
18 Defendants deny these allegations.

19 16. Paragraph No. 16. The State Defendant lack sufficient information or
20 belief to respond to the factual allegations in this paragraph, and on that basis deny
21 each and every allegation.

22 17. Paragraph No. 17. The State Defendant lack sufficient information or
23 belief to respond to the factual allegations in this paragraph, and on that basis deny
24 each and every allegation. The remaining allegations contain legal argument, and
25 no answer is required. To the extent that a response is required, the State
26 Defendants deny these allegations.

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1 18. Paragraph No. 18. The State Defendant lack sufficient information or
2 belief to respond to the factual allegations in this paragraph, and on that basis deny
3 each and every allegation.

4 19. Paragraph No. 19. The State Defendant lack sufficient information or
5 belief to respond to the factual allegations in this paragraph, and on that basis deny
6 each and every allegation.

7 **[Defendants]**

8 20. Paragraph No. 20. The State Defendants admit that Gavin Newsom is
9 the Governor of the State of California and that his authority is established in
10 Article 5, section 1 of the California Constitution. The remaining allegations
11 contain argument, and no answer is required. To the extent that a response is
12 required, the State Defendants deny these allegations.

13 21. Paragraph No. 21. The State Defendants admit that Rob Bonta is the
14 Attorney General of the State of California and is the chief law enforcement officer
15 of the State. The remaining allegations contain Plaintiffs' characterization of the
16 law and legal argument, and no answer is required. To the extent that a response is
17 required, the State Defendants deny these allegations.

18 22. Paragraph No. 22. The State Defendants admit that Todd Spitzer is the
19 Orange County District Attorney. The remaining allegations contain Plaintiffs'
20 characterization of the law and legal argument, and no answer is required. To the
21 extent that a response is required, the State Defendants deny these allegations.

22 23. Paragraph No. 23. The State Defendants admit that Karen Ross is the
23 Secretary of the California Department of Food and Agriculture (CDFA) and that
24 the Department's counsel represents District Agricultural Associations in the state.
25 The remaining allegations contain Plaintiffs' characterization of the law and legal
26 argument, and no answer is required. To the extent that a response is required, the
27 State Defendants deny these allegations.

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1 30. Paragraph No. 30. This paragraph consists of allegations describing
2 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
3 allegations mischaracterize the law, the State Defendants deny them.

4 31. Paragraph No. 31. This paragraph consists of allegations describing
5 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
6 allegations mischaracterize the law, the State Defendants deny them.

7 32. Paragraph No. 32. This paragraph consists of allegations describing
8 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
9 allegations mischaracterize the law, the State Defendants deny them.

10 33. Paragraph No. 33. This paragraph consists of allegations describing
11 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
12 allegations mischaracterize the law, the State Defendants deny them.

13 34. Paragraph No. 34. This paragraph consists of allegations describing the
14 Constitution and case law, which speak for themselves, and no answer is required.
15 To the extent Plaintiffs’ allegations mischaracterize the law, the State Defendants
16 deny them.

17 **[The Second Amendment Right to Keep and Bear Arms Under the Law]**

18 35. Paragraph No. 35. This paragraph consists of references to the
19 Constitution, which speaks for itself, and no answer is required. To the extent
20 Plaintiffs’ allegations mischaracterize the law, the State Defendants deny them.

21 36. Paragraph No. 36. This paragraph consists of allegations describing
22 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
23 allegations mischaracterize the law, the State Defendants deny them.

24 37. Paragraph No. 37. This paragraph consists of allegations describing
25 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
26 allegations mischaracterize the law, the State Defendants deny them.

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1 38. Paragraph No. 38. This paragraph consists of allegations describing
2 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
3 allegations mischaracterize the law, the State Defendants deny them.

4 39. Paragraph No. 39. This paragraph consists of allegations describing
5 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
6 allegations mischaracterize the law, the State Defendants deny them.

7 **[The Fourteenth Amendment Right to Equal Protection Under the Law]**

8 40. Paragraph No. 40. This paragraph consists of allegations describing the
9 Constitution and federal statute, which speak for themselves, and no answer is
10 required. To the extent Plaintiffs’ allegations mischaracterize the law, the State
11 Defendants deny them.

12 41. Paragraph No. 41. This paragraph consists of allegations describing the
13 Constitution, which speaks for itself, and no answer is required. To the extent
14 Plaintiffs’ allegations mischaracterize the law, the State Defendants deny them.

15 42. Paragraph No. 42. This paragraph consists of allegations describing
16 case law that speaks for itself, and no answer is required. To the extent Plaintiffs’
17 allegations mischaracterize the law, the State Defendants deny them.

18 **[Regulation of Gun Show Events in California]**

19 43. Paragraph No. 43. This paragraph consists of allegations that contain
20 Plaintiffs’ characterization of their case and legal argument, and no answer is
21 required. To the extent that a response is required, the State Defendants deny each
22 and every allegation.

23 44. Paragraph No. 44. This paragraph consists of allegations that contain
24 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
25 that a response is required, the State Defendants deny each and every allegation.

26 45. Paragraph No. 45. This paragraph consists of allegations that contain
27 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
28 that a response is required, the State Defendants deny each and every allegation.

1 46. Paragraph No. 46. This paragraph consists of allegations that contain
2 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
3 that a response is required, the State Defendants deny each and every allegation.

4 47. Paragraph No. 47. This paragraph consists of allegations that contain
5 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
6 that a response is required, the State Defendants deny each and every allegation.

7 48. Paragraph No. 48. This paragraph consists of allegations that contain
8 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
9 that a response is required, the State Defendants deny each and every allegation.

10 49. Paragraph No. 49. This paragraph consists of allegations that contain
11 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
12 that a response is required, the State Defendants deny each and every allegation.

13 50. Paragraph No. 50. This paragraph consists of allegations that contain
14 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
15 that a response is required, the State Defendants deny each and every allegation.

16 51. Paragraph No. 51. This paragraph consists of allegations that contain
17 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
18 that a response is required, the State Defendants deny each and every allegation.

19 52. Paragraph No. 52. This paragraph consists of allegations that contain
20 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
21 that a response is required, the State Defendants deny each and every allegation.

22 53. Paragraph No. 53. This paragraph consists of allegations that contain
23 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
24 that a response is required, the State Defendants deny each and every allegation.

25 54. Paragraph No. 54. This paragraph consists of allegations that contain
26 Plaintiffs’ characterizations of the law, and no answer is required. To the extent
27 that a response is required, the State Defendants deny each and every allegation.

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1 64. Paragraph No. 64. The State Defendants lack sufficient information or
2 belief to respond to the factual allegations in this paragraph, and on that basis deny
3 each and every such allegation. This paragraph also consists of allegations that
4 contain Plaintiffs' characterization of their case, and no answer is required. To the
5 extent that a response is required, the State Defendants deny these allegations.

6 65. Paragraph No. 65. This paragraph consists of allegations that contain
7 Plaintiffs' characterization of their case, and no answer is required. To the extent
8 that a response is required, the State Defendants deny each and every allegation.

9 66. Paragraph No. 66. This paragraph consists of allegations that contain
10 Plaintiffs' characterization of their case, and no answer is required. To the extent
11 that a response is required, the State Defendants deny each and every allegation.

12 67. Paragraph No. 67. This paragraph consists of allegations that contain
13 Plaintiffs' characterization of their case, and no answer is required. To the extent
14 that a response is required, the State Defendants deny each and every allegation.

15 68. Paragraph No. 68. This paragraph consists of allegations that contain
16 Plaintiffs' characterization of their case, and no answer is required. To the extent
17 that a response is required, the State Defendants deny each and every allegation.

18 69. Paragraph No. 69. This paragraph consists of allegations that contain
19 Plaintiffs' characterization of their case, and no answer is required. To the extent
20 that a response is required, the State Defendants deny each and every allegation.

21 70. Paragraph No. 70. This paragraph consists of allegations that contain
22 Plaintiffs' characterization of their case, and no answer is required. To the extent
23 that a response is required, the State Defendants deny each and every allegation.

24 71. Paragraph No. 71. This paragraph consists of allegations that contain
25 Plaintiffs' characterization of their case, and no answer is required. To the extent
26 that a response is required, the State Defendants deny each and every allegation.

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1 out its duties as set forth in California law. The State Defendants deny any
2 remaining allegations.

3 79. Paragraph No. 79. This paragraph consists of allegations that contain
4 Plaintiffs' characterizations of the law, and no answer is required. To the extent
5 that a response is required, the State Defendants admit that Defendant Ross is the
6 Secretary of the CDFA, and that CDFA must carry out its duties as set forth in
7 California law. The State Defendants deny any remaining allegations.

8 80. Paragraph No. 80. This paragraph consists of allegations that contain
9 Plaintiffs' characterizations of the law, and no answer is required. The State
10 Defendants admit that CDFA carries out its duties as set forth in California law.
11 The State Defendants deny any remaining allegations.

12 81. Paragraph No. 81. This paragraph consists of allegations describing the
13 CDFA Contracts Manual for Agricultural Districts, which speaks for itself, and no
14 answer is required. To the extent Plaintiffs' allegations mischaracterize the
15 Manual, the State Defendants deny them. The State Defendants deny the remaining
16 allegations.

17 82. Paragraph No. 82. The State Defendants deny the allegations.

18 83. Paragraph No. 83. This paragraph consists of allegations that contain
19 Plaintiffs' legal argument and case law, and no answer is required. To the extent
20 that a response is required, the State Defendants deny each and every allegation.

21 84. Paragraph No. 84. The State Defendants admit that the Fairgrounds is
22 used by many different groups and is a major event venue for large gatherings of
23 people to engage in expressive activities, including concerts, festivals, and industry
24 shows. This paragraph also consists of allegations describing the Fairground's
25 Rental Property Brochure, which speaks for itself. To the extent Plaintiffs'
26 allegations mischaracterize the Brochure, the State Defendants deny them.

27 85. Paragraph No. 85. This paragraph consists of allegations describing the
28 Fairground's Rental Property Brochure and Venue Rental information on the

1 Fairgrounds’ website, which speak for themselves, and no answer is required. To
2 the extent Plaintiffs’ allegations mischaracterizes these documents, the State
3 Defendants deny them.

4 86. Paragraph No. 86. This paragraph consists of allegations describing the
5 Fairgrounds’ Board of Directors Governing Policy Manual, which speaks for itself,
6 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
7 Manual, the State Defendants deny them.

8 87. Paragraph No. 87. This paragraph consists of allegations describing the
9 Fairgrounds’ Board of Directors Governing Policy Manual, which speaks for itself,
10 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
11 Manual, the State Defendants deny them.

12 88. Paragraph No. 88. The State Defendants lack sufficient information or
13 belief to respond to the factual allegations in this paragraph, and on that basis deny
14 each and every allegation.

15 **[Contracting for Use of the Fairgrounds]**

16 89. Paragraph No. 89. The State Defendants admit that the District has a
17 process for entering into rental agreements with returning clients. The State
18 Defendants deny any remaining allegations.

19 90. Paragraph No. 90. The State Defendants admit that the District and
20 clients, including Plaintiff B&L, correspond regarding available dates for the next
21 calendar year for arranging future events on the Fairgrounds. The State Defendants
22 deny any remaining allegations.

23 91. Paragraph No. 91. The State Defendants admit the allegations.

24 92. Paragraph No. 92. The State Defendants admit that the “hold” system
25 essentially operates as a right of first refusal to the benefit of certain returning
26 contractors, and the Defendant may not allow a newer vendor to reserves dates that
27 Plaintiff B&L prefers, even if there is no official contract with Plaintiff B&L yet.

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1 93. Paragraph No. 93. The State Defendants admit that the “hold” system
2 provides the District with a standardized process for entering into rental agreements
3 with returning clients. The State Defendants deny each and every remaining
4 allegation.

5 94. Paragraph No. 94. The State Defendants lack sufficient information or
6 belief to respond to the factual allegations in this paragraph, and on that basis deny
7 each and every allegation. To the extent this paragraph alleges that the laws
8 challenged in this case ban gun shows, the State Defendants deny this allegation.

9 95. Paragraph No. 95. The State Defendants admit the allegations.

10 96. Paragraph No. 96. The State Defendants lack sufficient information or
11 belief to respond to the factual allegations in this paragraph, and on that basis deny
12 each and every allegation.

13 **[Ban on Gun Shows at Other Fairgrounds & Resulting Litigation]**

14 97. Paragraph No. 97. This paragraph consists of allegations that contain
15 Plaintiffs’ characterization of their case, and no answer is required. To the extent
16 that a response is required, the State Defendants deny each and every allegation.

17 98. Paragraph No. 98. This paragraph consists of allegations that contain
18 Plaintiffs’ characterization of their case, and no answer is required. To the extent
19 that a response is required, the State Defendants deny each and every allegation.

20 99. Paragraph No. 99. This paragraph consists of allegations that contain
21 Plaintiffs’ characterization of their case, and no answer is required. To the extent
22 that a response is required, the State Defendants deny each and every allegation.

23 100. Paragraph No. 100. This paragraph consists of allegations that contain
24 Plaintiffs’ characterization of their case and case law, and no answer is required.
25 To the extent that a response is required, the State Defendants deny each and every
26 allegation.

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1 101. Paragraph No. 101. The State Defendants lack sufficient information
2 or belief to respond to the factual allegations in this paragraph, and on that basis
3 deny each and every allegation.

4 102. Paragraph No. 102. The State Defendants lack sufficient information
5 or belief to respond to the factual allegations in this paragraph, and on that basis
6 deny each and every allegation.

7 103. Paragraph No. 103. This paragraph consists of allegations describing
8 Defendant Newsom’s letter to the 22nd DAA, dated April 23, 2018, which speaks
9 for itself, and no answer is required. To the extent Plaintiffs’ allegations
10 mischaracterize the letter, the State Defendants deny them.

11 104. Paragraph No. 104. This paragraph consists of allegations describing
12 Assemblymember Todd Gloria’s letter to the 22nd DAA, dated September 10,
13 2018, which speaks for itself, and no answer is required. To the extent Plaintiffs’
14 allegations mischaracterize the letter, the State Defendants deny them.

15 105. Paragraph No. 105. This paragraphs consists of allegations describing
16 a “fair board ad hoc ‘Contracts Committee’ recommend[ation]” at a public hearing
17 on September 11, 2018, which speaks for itself, and no response is required. To the
18 extent Plaintiffs’ allegations mischaracterize the recommendation, the State
19 Defendants deny them.

20 106. Paragraph No. 106. This paragraphs consists of allegations describing
21 testimony before the 22nd DAA at the September 11, 2018 hearing made by Patrick
22 Kerins, which speaks for itself, and no response is required. To the extent
23 Plaintiffs’ allegations mischaracterize the testimony, the State Defendants deny
24 them.

25 107. Paragraph No. 107. This paragraphs consists of allegations describing
26 Patrick Kerins’ memorandum prepared for the 22nd DAA Board in 2016, which
27 speaks for itself, and no response is required. To the extent Plaintiffs’ allegations
28 mischaracterize the memorandum, the State Defendants deny them.

1 108. Paragraph No. 108. This paragraphs consists of allegations describing
2 Patrick Kerins’ memorandum prepared for the 22nd DAA Board in 2016, which
3 speaks for itself, and no response is required. To the extent Plaintiffs’ allegations
4 mischaracterize the memorandum, the State Defendants deny them.

5 109. Paragraph No. 109. The State Defendants lack sufficient information
6 or belief to respond to the factual allegations in this paragraph, and on that basis
7 deny each and every allegation.

8 110. Paragraph No. 110. The State Defendants lack sufficient information
9 or belief to respond to the factual allegations in this paragraph, and on that basis
10 deny each and every allegation.

11 111. Paragraph No. 111. This paragraph consists of allegations that contain
12 Plaintiffs’ characterization of *B&L Prods. v. 22nd Dist. Agric. Ass’n*, 394 F. Supp.
13 3d 1226 (S.D. Cal. 2019), which speaks for itself, and no answer is required. To
14 the extent Plaintiffs’ allegations mischaracterize that case, the State Defendants
15 deny them.

16 112. Paragraph No. 112. This paragraph consists of allegations that
17 contain Plaintiff’s characterization of *B&L Prods. v. 22nd Dist. Agric. Ass’n*, 394 F.
18 Supp. 3d 1226 (S.D. Cal. 2019), which speaks for itself, and no answer is required.
19 To the extent Plaintiffs’ allegations mischaracterize that case, the State Defendants
20 deny them.

21 113. Paragraph No. 113. This paragraph consists of allegations describing
22 a settlement agreement resolving the matter *B&L Prods. v. 22nd Dist. Agric. Ass’n*,
23 394 F. Supp. 3d 1226 (S.D. Cal. 2019), which speaks for itself, and no answer is
24 required. To the extent Plaintiffs’ allegations mischaracterize the agreement, the
25 State Defendants deny them.

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[California’s Assembly Bill 893 (Gloria)]

114. Paragraph No. 114. The State Defendants admit that Assemblymember Todd Gloria introduced AB 893 on or about February 20, 2019. The State Defendants deny any remaining allegations.

115. Paragraph No. 115. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

116. Paragraph No. 116. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

117. Paragraph No. 117. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

118. Paragraph No. 118. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

119. Paragraph No. 119. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

120. Paragraph No. 120. This paragraph consists of allegations describing AB 893, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

121. Paragraph No. 121. This paragraph consists of allegations describing AB 893’s legislative history, which speaks for itself, and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the legislative history, the State Defendants deny them.

1 122. Paragraph No. 122. This paragraph consists of allegations describing
2 AB 893, which speaks for itself, and no answer is required. To the extent
3 Plaintiffs’ allegations mischaracterize the bill, the State Defendants deny them.

4 123. Paragraph No. 123. This paragraph consists of allegations describing
5 an analysis of AB 893, which speaks for itself, and no answer is required. To the
6 extent Plaintiffs’ allegations mischaracterize the analysis, the State Defendants
7 deny them.

8 124. Paragraph No. 124. This paragraph consists of allegations describing
9 an analysis of AB 893, which speaks for itself, and no answer is required. To the
10 extent Plaintiffs’ allegations mischaracterize the analysis, the State Defendants
11 deny them.

12 125. Paragraph No. 125. This paragraph consists of allegations describing
13 an analysis of AB 893 and a report cited therein, which speak for themselves, and
14 no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
15 analysis and report, the State Defendants deny them.

16 126. Paragraph No. 126. This paragraph consists of allegations describing
17 an analysis of AB 893 and a report cited therein, which speak for themselves, and
18 no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
19 analysis and report, the State Defendants deny them.

20 127. Paragraph No. 127. This paragraph consists of allegations describing
21 an analysis of AB 893 and a report cited therein, which speak for themselves, and
22 no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
23 analysis and report, the State Defendants deny them.

24 128. Paragraph No. 128. This paragraph consists of allegations describing
25 an analysis of AB 893 and a report cited therein, which speak for themselves, and
26 no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
27 analysis and report, the State Defendants deny them.

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1 136. Paragraph No. 136. This paragraph consists of allegations describing
2 SB 264, which speaks for itself, and no answer is required. To the extent Plaintiffs’
3 allegations mischaracterize the bill, the State Defendants deny them.

4 137. Paragraph No. 137. This paragraph consists of allegations describing
5 SB 264, which speaks for itself, and no answer is required. To the extent Plaintiffs’
6 allegations mischaracterize the bill, the State Defendants deny them. The State
7 Defendants deny any remaining allegations.

8 138. Paragraph No. 138. This paragraph consists of allegations describing
9 SB 264’s legislative history, which speaks for itself, and no answer is required. To
10 the extent Plaintiffs’ allegations mischaracterize the legislative history, the State
11 Defendants deny them.

12 139. Paragraph No. 139. This paragraph consists of allegations describing
13 SB 264, which speaks for itself, and no answer is required. To the extent Plaintiffs’
14 allegations mischaracterize the bill, the State Defendants deny them.

15 140. Paragraph No. 140. This paragraph consists of allegations describing
16 an analysis of SB 264 and a report cited therein, which speak for themselves, and
17 no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
18 analysis and report, the State Defendants deny them.

19 141. Paragraph No. 141. This paragraph consists of Senator Min’s
20 testimony to a Senate committee on March 16, 2021, which speak for themselves,
21 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
22 testimony, the State Defendants deny them.

23 142. Paragraph No. 142. This paragraph consists of Senator Min’s
24 testimony to a Senate committee on March 16, 2021, which speak for themselves,
25 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
26 testimony, the State Defendants deny them.

27 143. Paragraph No. 143. This paragraph consists of Senator Min’s
28 testimony to a Senate committee on March 16, 2021, which speak for themselves,

1 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
2 testimony, the State Defendants deny them.

3 144. Paragraph No. 144. This paragraph consists of Senator Min’s
4 testimony to a Senate committee on March 16, 2021, which speak for themselves,
5 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
6 testimony, the State Defendants deny them.

7 **[California’s Senate Bill 915 (Min)]**

8 145. Paragraph No. 145. The State Defendants admit that Senator Min
9 introduced Senate Bill 915 on February 2, 2022, and deny all remaining allegations.

10 146. Paragraph No. 146. This paragraph consists of allegations describing
11 SB 915, which speaks for itself, and no answer is required. To the extent Plaintiffs’
12 allegations mischaracterize the bill, the State Defendants deny them.

13 147. Paragraph No. 147. This paragraph consists of allegations describing
14 SB 915, which speaks for itself, and no answer is required. To the extent Plaintiffs’
15 allegations mischaracterize the bill, the State Defendants deny them.

16 148. Paragraph No. 148. The State Defendants admit that SB 915 took
17 effect on January 1, 2023. This paragraph also consists of allegations describing
18 SB 915, which speaks for itself, and no answer is required. To the extent Plaintiffs’
19 allegations mischaracterize the bill, the State Defendants deny them. The State
20 Defendants lack sufficient information or belief to respond to the remaining factual
21 allegations in this paragraph, and on that basis deny each and every allegation.

22 149. Paragraph No. 149. This paragraph consists of allegations describing
23 a press release, which speaks for itself, and no answer is required. To the extent
24 Plaintiffs’ allegations mischaracterize the press release, the State Defendants deny
25 them. The remaining allegations contain Plaintiffs’ characterization of their case
26 and legal argument, and no answer is required. To the extent that a response is
27 required, the State Defendants deny them.

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1 150. Paragraph No. 150. This paragraph consists of allegations describing
2 SB 915 and Senator Min’s testimony about it, which speak for themselves, and no
3 answer is required. To the extent Plaintiffs’ allegations mischaracterize the bill or
4 testimony, the State Defendants deny them.

5 151. Paragraph No. 151. This paragraph consists of allegations describing
6 SB 915’s legislative history, which speaks for itself, and no answer is required. To
7 the extent Plaintiffs’ allegations mischaracterize the legislative history, the State
8 Defendants deny them.

9 152. Paragraph No. 152. This paragraph consists of allegations describing
10 SB 915’s legislative history and a report cited therein, which speak for themselves,
11 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
12 legislative history and report, the State Defendants deny them.

13 **[The Impact of SB 264 and SB 915 on the Orange County Gun Show]**

14 153. Paragraph No. 153. This paragraph consists of allegations that
15 contain Plaintiffs’ characterization of their case, and no answer is required. To the
16 extent that a response is required, the State Defendants deny each and every
17 allegation.

18 154. Paragraph No. 154. This paragraph consists of allegations describing
19 SB 264 and 915, which speak for themselves, and no answer is required. To the
20 extent Plaintiffs’ allegations mischaracterize the bills, the State Defendants deny
21 them.

22 155. Paragraph No. 155. This paragraph consists of allegations describing
23 SB 264 and 915, as well as statements by Senator Min, which speak for themselves,
24 and no answer is required. To the extent Plaintiffs’ allegations mischaracterize the
25 bills and statements, the State Defendants deny them.

26 156. Paragraph No. 156. This paragraph consists of allegations describing
27 an analysis of SB 264, which speaks for itself, and no answer is required. To the
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1 extent Plaintiffs' allegations mischaracterize the analysis, the State Defendants
2 deny them.

3 157. Paragraph No. 157. This paragraph consists of allegations describing
4 a press release, which speaks for itself, and no answer is required. To the extent
5 Plaintiffs' allegations mischaracterize the press release, the State Defendants deny
6 them.

7 158. Paragraph No. 158. This paragraph consists of allegations describing
8 a press release, which speaks for itself, and no answer is required. To the extent
9 Plaintiffs' allegations mischaracterize the press release, the State Defendants deny
10 them.

11 159. Paragraph No. 159. This paragraph consists of allegations describing
12 a letter, which speaks for itself, and no answer is required. To the extent Plaintiffs'
13 allegations mischaracterize the letter, the State Defendants deny them.

14 160. Paragraph No. 160. This paragraph consists of allegations describing
15 a letter, which speaks for itself, and no answer is required. To the extent Plaintiffs'
16 allegations mischaracterize the letter, the State Defendants deny them.

17 161. Paragraph No. 161. This paragraph consists of allegations describing
18 a letter, which speaks for itself, and no answer is required. To the extent Plaintiffs'
19 allegations mischaracterize the letter, the State Defendants deny them.

20 162. Paragraph No. 162. The State Defendants admit that Plaintiff reached
21 out to the District in late 2021 to request dates for events in 2022 and that the
22 District did not place the contracts for gun shows on the agenda for October,
23 November, or December 2021, as it was in the midst of considering the impact of
24 SB 264 on its operations. The State Defendants deny that Plaintiff reached out to
25 the District in 2022 to request dates for events.

26 163. Paragraph No. 163. This paragraph consists of allegations that contain
27 Plaintiffs' characterization of their case, and no answer is required. To the extent
28 that a response is required, the State Defendants deny each and every allegation.

1 164. Paragraph No. 164. The State Defendants deny the allegations.

2 165. Paragraph No. 165. The State Defendants admit that, when SB 264
3 and SB 915 are in effect, the District cannot enter into contracts for gun shows at
4 the Fairgrounds if firearms, ammunition, or firearm precursor parts will be sold
5 during the shows. The State Defendants deny that the District cannot and will not
6 enter into contracts for gun shows at the Fairgrounds when SB 264 and SB 915 are
7 in effect.

8 166. Paragraph No. 166. The State Defendants deny the allegations with
9 respect to the District. As to the remaining allegations, the State Defendants lack
10 sufficient information or belief to respond to the factual allegations in this
11 paragraph, and on that basis deny each and every allegation.

12 167. Paragraph No. 167. The State Defendants deny the allegations with
13 respect to the District. As to the remaining allegations, the State Defendants lack
14 sufficient information or belief to respond to the factual allegations in this
15 paragraph, and on that basis deny each and every allegation.

16 168. Paragraph No. 168. The State Defendants deny the allegations.

17 169. Paragraph No. 169. This paragraph consists of allegations that contain
18 Plaintiffs' characterization of their case and the law, and no answer is required. To
19 the extent that a response is required, the State Defendants deny each and every
20 allegation.

21 170. Paragraph No. 170. The State Defendants deny that the District has
22 refused to finalize event dates. The remaining allegations contain Plaintiffs'
23 characterization of their case, and no answer is required. To the extent that a
24 response is required, the State Defendants deny each and every allegation. The
25 State Defendants lack sufficient information or belief to respond to the factual
26 allegations in this paragraph, and on that basis deny each and every allegation.

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1 171. Paragraph No. 171. This paragraph consists of allegations that contain
2 Plaintiffs' characterization of their case, and no answer is required. To the extent
3 that a response is required, the State Defendants deny each and every allegation.

4 172. Paragraph No. 172. This paragraph consists of allegations that contain
5 Plaintiffs' characterization of their case, and no answer is required. To the extent
6 that a response is required, the State Defendants deny each and every allegation.

7 173. Paragraph No. 173. This paragraph consists of allegations that contain
8 Plaintiffs' characterization of their case and legal argument, and no answer is
9 required. To the extent that a response is required, the State Defendants deny each
10 and every allegation.

11 174. Paragraph No. 174. This paragraph consists of allegations that contain
12 Plaintiffs' characterization of their case and legal argument, and no answer is
13 required. To the extent that a response is required, the State Defendants deny each
14 and every allegation.

15 175. Paragraph No. 175. This paragraph consists of allegations that contain
16 Plaintiffs' characterization of their case and legal argument, and no answer is
17 required. To the extent that a response is required, the State Defendants deny each
18 and every allegation.

19 176. Paragraph No. 176. This paragraph consists of allegations that contain
20 Plaintiffs' characterization of their case and legal argument, and no answer is
21 required. To the extent that a response is required, the State Defendants deny each
22 and every allegation.

23 177. Paragraph No. 177. The State Defendants lack sufficient information
24 or belief to respond to the allegations in this paragraph, and on that basis deny each
25 and every allegation.

26 178. Paragraph No. 178. The State Defendants lack sufficient information
27 or belief to respond to the allegations in this paragraph, and on that basis deny each
28 and every allegation.

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FIRST CAUSE OF ACTION
Violation of Right to Free Speech Under U.S. Const., amend. I
42 U.S.C. § 1983

(By Plaintiffs Clark, Johnson, Littrell, Merson, CRPA, APAGOA, 2ALC, SAF
Against All Defendants)

179. Paragraph No. 179. Plaintiffs incorporate by reference the allegations of paragraphs 1 through 178, and in its Answer, the State Defendant incorporates by reference its corresponding responses.

180. Paragraph No. 180. The State Defendants admit the allegations.

181. Paragraph No. 181. The State Defendants lack sufficient information or belief to respond to the allegations in this paragraph, and on that basis deny each and every allegation.

182. Paragraph No. 182. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case and legal argument, and no answer is required. To the extent that a response is required, the State Defendants deny each and every allegation.

183. Paragraph No. 183. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case and legal argument, and no answer is required. To the extent that a response is required, the State Defendants deny each and every allegation.

184. Paragraph No. 184. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case and legal argument, and no answer is required. To the extent that a response is required, the State Defendants deny each and every allegation.

185. Paragraph No. 185. This paragraph consists of allegations that contain Plaintiffs’ characterization of their case and legal argument, and no answer is required. To the extent that a response is required, the State Defendants deny each and every allegation.

1 186. Paragraph No. 186. This paragraph consists of allegations that contain
2 Plaintiffs’ characterization of their case and legal argument, and no answer is
3 required. To the extent that a response is required, the State Defendants deny each
4 and every allegation.

5 187. Paragraph No. 187. This paragraph consists of allegations that contain
6 Plaintiffs’ characterization of their case and legal argument, and no answer is
7 required. To the extent that a response is required, the State Defendants deny each
8 and every allegation.

9 188. Paragraph No. 188. This paragraph consists of allegations that contain
10 Plaintiffs’ characterization of their case and legal argument, and no answer is
11 required. To the extent that a response is required, the State Defendants deny each
12 and every allegation.

13 189. Paragraph No. 189. This paragraph consists of allegations that contain
14 Plaintiffs’ characterization of their case and legal argument, and no answer is
15 required. To the extent that a response is required, the State Defendants deny each
16 and every allegation.

17 **SECOND CAUSE OF ACTION**
18 **Violation of Right to Free Speech Under U.S. Const., amend. I**
19 **Mixed Political-Commercial**
20 **42 U.S.C. 1983**

(By Plaintiff Crossroads Against All Defendants)

21 190. Paragraph No. 190. Plaintiffs incorporate by reference the allegations
22 of paragraphs 1 through 189, and in its Answer, the State Defendant incorporates by
23 reference its corresponding responses.

24 191. Paragraph No. 191. The State Defendants admit the allegations.

25 192. Paragraph No. 192. This paragraph consists of allegations that contain
26 Plaintiffs’ characterization of their case and legal argument, and no answer is
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1 required. To the extent that a response is required, the State Defendants deny each
2 and every allegation.

3 193. Paragraph No. 193. This paragraph consists of allegations describing
4 case law that speaks for itself. To the extent Plaintiffs' allegations mischaracterize
5 the law, the State Defendants deny them.

6 194. Paragraph No. 194. This paragraph consists of allegations that contain
7 Plaintiffs' characterization of their case and legal argument, and no answer is
8 required. To the extent that a response is required, the State Defendants deny each
9 and every allegation.

10 195. Paragraph No. 195. This paragraph consists of allegations that contain
11 Plaintiffs' characterization of their case and legal argument, and no answer is
12 required. To the extent that a response is required, the State Defendants deny each
13 and every allegation.

14 196. Paragraph No. 196. This paragraph consists of allegations that contain
15 Plaintiffs' characterization of their case and legal argument, and no answer is
16 required. To the extent that a response is required, the State Defendants deny each
17 and every allegation.

18 197. Paragraph No. 197. The State Defendants deny each and every
19 allegation.

20 198. Paragraph No. 198. This paragraph consists of allegations that contain
21 Plaintiffs' characterization of their case and legal argument, and no answer is
22 required. To the extent that a response is required, the State Defendants deny each
23 and every allegation.

24 199. Paragraph No. 199. This paragraph consists of allegations that contain
25 Plaintiffs' characterization of their case and legal argument, and no answer is
26 required. To the extent that a response is required, the State Defendants deny each
27 and every allegation.

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1 207. Paragraph No. 207. This paragraph consists of allegations that contain
2 Plaintiffs' characterization of their case and legal argument, and no answer is
3 required. To the extent that a response is required, the State Defendants deny each
4 and every allegation.

5 208. Paragraph No. 208. This paragraph consists of allegations that contain
6 Plaintiffs' characterization of their case and legal argument, and no answer is
7 required. To the extent that a response is required, the State Defendants deny each
8 and every allegation.

9 209. Paragraph No. 209. This paragraph consists of allegations that contain
10 Plaintiffs' characterization of their case and legal argument, and no answer is
11 required. To the extent that a response is required, the State Defendants deny each
12 and every allegation.

13 210. Paragraph No. 210. This paragraph consists of allegations that
14 contain Plaintiffs' characterization of their case and legal argument, and no answer
15 is required. To the extent that a response is required, the State Defendants deny
16 each and every allegation.

17 211. Paragraph No. 211. This paragraph consists of allegations that contain
18 Plaintiffs' characterization of their case and legal argument, and no answer is
19 required. To the extent that a response is required, the State Defendants deny each
20 and every allegation.

21 212. Paragraph No. 212. This paragraph consists of allegations that contain
22 Plaintiffs' characterization of their case and legal argument, and no answer is
23 required. To the extent that a response is required, the State Defendants deny each
24 and every allegation.

25 213. Paragraph No. 213. This paragraph consists of allegations that contain
26 Plaintiffs' characterization of their case and legal argument, and no answer is
27 required. To the extent that a response is required, the State Defendants deny each
28 and every allegation.

1 required. To the extent that a response is required, the State Defendants deny each
2 and every allegation.

3 221. Paragraph No. 221. This paragraph consists of allegations that contain
4 Plaintiffs' characterization of their case and legal argument, and no answer is
5 required. To the extent that a response is required, the State Defendants deny each
6 and every allegation.

7 222. Paragraph No. 222. This paragraph consists of allegations that contain
8 Plaintiffs' characterization of their case and legal argument, and no answer is
9 required. To the extent that a response is required, the State Defendants deny each
10 and every allegation.

11 **FIFTH CAUSE OF ACTION**
12 **Violation of Right to Assembly and Association Under U.S. Const., amend I.**
13 **42 U.S.C. § 1983**
(By All Plaintiffs Against All Defendants)

14 223. Paragraph No. 223. Plaintiffs incorporate by reference the allegations
15 of paragraphs 1 through 222, and in its Answer, the State Defendant incorporates by
16 reference its corresponding responses.

17 224. Paragraph No. 224. The State Defendants admit the allegations.

18 225. Paragraph No. 225. This paragraph consists of allegations that contain
19 Plaintiffs' characterization of their case and legal argument, and no answer is
20 required. To the extent that a response is required, the State Defendants deny each
21 and every allegation.

22 226. Paragraph No. 226. This paragraph consists of allegations that contain
23 Plaintiffs' characterization of their case and legal argument, and no answer is
24 required. To the extent that a response is required, the State Defendants deny each
25 and every allegation.

26 227. Paragraph No. 227. This paragraph consists of allegations that contain
27 Plaintiffs' characterization of their case and legal argument, and no answer is
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1 required. To the extent that a response is required, the State Defendants deny each
2 and every allegation.

3 228. Paragraph No. 228. This paragraph consists of allegations that contain
4 Plaintiffs' characterization of their case and legal argument, and no answer is
5 required. To the extent that a response is required, the State Defendants deny each
6 and every allegation.

7 229. Paragraph No. 229. This paragraph consists of allegations that contain
8 Plaintiffs' characterization of their case and legal argument, and no answer is
9 required. To the extent that a response is required, the State Defendants deny each
10 and every allegation.

11 230. Paragraph No. 230. This paragraph consists of allegations that contain
12 Plaintiffs' characterization of their case and legal argument, and no answer is
13 required. To the extent that a response is required, the State Defendants deny each
14 and every allegation.

15 231. Paragraph No. 231. This paragraph consists of allegations that contain
16 Plaintiffs' characterization of their case and legal argument, and no answer is
17 required. To the extent that a response is required, the State Defendants deny each
18 and every allegation.

19 232. Paragraph No. 232. This paragraph consists of allegations that contain
20 Plaintiffs' characterization of their case and legal argument, and no answer is
21 required. To the extent that a response is required, the State Defendants deny each
22 and every allegation.

23 **SIXTH CAUSE OF ACTION**
24 **Violation of The Right to Equal Protection Under U.S. Const., amend. XIV**
25 **42 U.S.C. § 1983**
26 **(By All Plaintiffs Against All Defendants)**
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1 233. Paragraph No. 233. Plaintiffs incorporate by reference the allegations
2 of paragraphs 1 through 232, and in its Answer, the State Defendant incorporates by
3 reference its corresponding responses.

4 234. Paragraph No. 234. This paragraph consists of allegations that contain
5 Plaintiffs' characterization of their case and legal argument, and no answer is
6 required. To the extent that a response is required, the State Defendants deny each
7 and every allegation.

8 235. Paragraph No. 235. This paragraph consists of allegations that contain
9 Plaintiffs' characterization of their case and legal argument, and no answer is
10 required. To the extent that a response is required, the State Defendants deny each
11 and every allegations.

12 236. Paragraph No. 236. This paragraph consists of allegations that contain
13 Plaintiffs' characterization of their case and legal argument, and no answer is
14 required. To the extent that a response is required, the State Defendants deny each
15 and every allegation.

16 237. Paragraph No. 237. This paragraph consists of allegations that contain
17 Plaintiffs' characterization of their case and legal argument, and no answer is
18 required. To the extent that a response is required, the State Defendants deny each
19 and every allegation.

20 238. Paragraph No. 238. This paragraph consists of allegations that contain
21 Plaintiffs' characterization of their case, legal argument, and case law, and no
22 answer is required. To the extent that a response is required, the State Defendants
23 deny each and every allegation and deny any allegations that mischaracterize the
24 law.

25 239. Paragraph No. 239. This paragraph consists of allegations that contain
26 Plaintiffs' characterization of their case and legal argument, and no answer is
27 required. To the extent that a response is required, the State Defendants deny each
28 and every allegation.

1 argument, and no answer is required. To the extent that a response is required, the
2 State Defendants deny each and every allegation.

3 247. Paragraph No. 247, incorrectly numbered 239. This paragraph
4 consists of allegations that contain Plaintiffs' characterization of their case and legal
5 argument, and no answer is required. To the extent that a response is required, the
6 State Defendants deny each and every allegation.

7 248. Paragraph No. 248, incorrectly numbered 240. This paragraph consists
8 of allegations that contain Plaintiffs' characterization of their case and legal
9 argument, and no answer is required. To the extent that a response is required, the
10 State Defendants deny each and every allegation.

11 **PRAYER FOR RELIEF**

12 The State Defendants deny that Plaintiffs are entitled to any of the relief
13 requested in the FAC, or any relief whatsoever. To the extent that the Prayer for
14 Relief contains any allegations to which a response is required, the State
15 Defendants deny them.

16 **AFFIRMATIVE DEFENSES**

17 **FIRST AFFIRMATIVE DEFENSE**

18 The Court should dismiss the FAC because it fails to state a claim upon which
19 relief can be granted.

20 **SECOND AFFIRMATIVE DEFENSE**

21 The FAC, all causes of action therein and relief requested, are barred by the
22 United States Constitution, Amendment XI.

23 **THIRD AFFIRMATIVE DEFENSE**

24 The causes of action are time-barred by the statute of limitations.

25 **FOURTH AFFIRMATIVE DEFENSE**

26 Plaintiffs' claims are barred because Plaintiffs lacks standing.

27 **FIFTH AFFIRMATIVE DEFENSE**

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1 Dated: November 20, 2023

Respectfully submitted,

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ROB BONTA
Attorney General of California

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R. MATTHEW WISE
Supervising Deputy Attorney General

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/s/ NICOLE J. KAU

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NICOLE J. KAU
Deputy Attorney General
*Attorneys 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 Name: **B&L Productions, Inc., et al. v. Gavin Newsom, et al.** No. **8:22-cv-01518 JWH (JDEx)**

I hereby certify that on November 20, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STATE DEFENDANTS' ANSWER TO FIRST AMENDED COMPLAINT

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 20, 2023, at Los Angeles, California.

Kevin Carballo

Declarant

Kevin Carballo

Signature