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

13 CALIFORNIA RIFLE & PISTOL
 ASSOCIATION, INCORPORATED; THE
 14 SECOND AMENDMENT
 FOUNDATION; GUN OWNERS OF
 15 AMERICA, INC.; GUN OWNERS
 FOUNDATION; GUN OWNERS OF
 16 CALIFORNIA, INC.; ERICK
 VELASQUEZ, an individual; CHARLES
 17 MESSEL, an individual; BRIAN
 WEIMER, an individual; CLARENCE
 18 RIGALI, an individual; KEITH REEVES,
 an individual; CYNTHIA GABALDON, an
 19 individual; and STEPHEN HOOVER, an
 individual,

20
 21 Plaintiffs,

22 v.

23 LOS ANGELES COUNTY SHERIFF'S
 DEPARTMENT; SHERIFF ROBERT
 24 LUNA, in his official capacity; LA VERNE
 POLICE DEPARTMENT; LA VERNE
 25 CHIEF OF POLICE COLLEEN FLORES,
 in her official capacity; ROBERT BONTA,
 26 in his official capacity as Attorney General
 of the State of California; and DOES 1-10,

27
 28 Defendants.

2:23-cv-10169

**STIPULATION TO EXTEND
 TIME TO RESPOND TO
 COMPLAINT**

Sherilyn Peace Garnett,
 United States District Judge

Action Filed: December 5, 2023

1 Pursuant to Local Rule 8-3, Plaintiffs California Rifle & Pistol Association,
2 Incorporated, The Second Amendment Foundation, Gun Owners of America, Inc.,
3 Gun Owners Foundation, Gun Owners of California, Inc., Erick Velasquez, Charles
4 Messel, Brian Weimer, Clarence Rigali, Keith Reeves, Cynthia Gabaldon, and
5 Stephen Hoover (collectively “Plaintiffs”); Defendant Robert Bonta, in his official
6 capacity as Attorney General of the State of California (“Defendant Bonta”);
7 Defendants Los Angeles County Sheriff’s Department and Sheriff Robert Luna, in
8 his official capacity (collectively “County Defendants”); and Defendants La Verne
9 Police Department and La Verne Chief of Police Colleen Flores, in her official
10 capacity (collectively “La Verne Defendants” and together with Plaintiffs,
11 Defendant Bonta, and County Defendants, the “Parties”), through their respective
12 attorneys of record, hereby stipulate and request as follows:

13 WHEREAS Plaintiffs filed their Complaint on December 5, 2023, and;

14 WHEREAS Defendant Bonta was served on December 6, 2023 and is
15 currently due to respond to the Complaint on or before December 27, 2023, and;

16 WHEREAS County Defendants were served on December 11, 2023, and are
17 currently due to respond to the Complaint on or before January 2, 2024, and;

18 WHEREAS La Verne Defendants were served on December 11, 2023 and are
19 currently due to respond to the Complaint on or before January 2, 2024, and;

20 WHEREAS Plaintiffs intend to file a motion for preliminary injunctive relief
21 in January 2024, and;

22 WHEREAS the Parties agree that it is not necessary for Defendant Bonta, the
23 County Defendants, or the La Verne Defendants to respond to the Complaint during
24 the pendency of preliminary injunctive relief proceedings, and that extending the
25 response deadlines until after the preliminary injunctive relief proceedings have
26 concluded will serve the interests of judicial efficiency;

27 NOW THEREFORE, the parties stipulate to extend the deadline for Defendant
28 Bonta’s, the County Defendants’, and the La Verne Defendants’ responses to the

1 Complaint until twenty-one days after the Court issues a ruling on Plaintiffs’
2 forthcoming motion for preliminary injunctive relief.

3 **IT IS SO STIPULATED.**

4 Dated: December 21, 2023

Respectfully submitted,

5 ROB BONTA
6 Attorney General of California
7 MARK R. BECKINGTON
8 Supervising Deputy Attorney General
9 JANE E. REILLEY
10 Deputy Attorney General

11 */s/ Christina R.B. López*

12 CHRISTINA R.B. LÓPEZ
13 Deputy Attorney General
14 *Attorneys for Defendant Robert Bonta*

15 Dated: December 21, 2023

MICHEL & ASSOCIATES, P.C.

16 */s/ Konstadinos Moros*

17 KONSTADINOS MOROS
18 *Attorneys for Plaintiffs*

19 Dated: December 21, 2023

DAWYN R. HARRISON
County Counsel

20 By:

21 */s/ Caroline Shahinian*

22 CAROLINE SHAHINIAN
23 Deputy County Counsel
24 *Attorneys for Defendants Los Angeles*
25 *County Sheriff’s Department and Sheriff*
26 *Robert Luna*

27 Dated: December 21, 2023

JONES MAYER

28 */s/ Monica Choi Arredondo*

BRUCE A. LINDSAY
MONICA CHOI ARREDONDO
Attorneys for Defendants La Verne
Police Department and La Verne Chief of
Police Colleen Flores

DECLARATION OF SERVICE BY ELECTRONIC MAIL

Case Name: **California Rifle & Pistol Ass'n, Inc., et al. v. Los Angeles County Sheriff's Department, et al.**

Case No.: **2:23-cv-10169**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter.

On December 21, 2023, I served the attached **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT** by transmitting a true copy via electronic mail as follows:

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Attorney for The Second Amendment Foundation

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 December 21, 2023, at Los Angeles, California.

Cecilia Apodaca

Declarant

/s/ Cecilia Apodaca

Signature