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Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc.
(D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California, Inc., Gun Owners of
7 America, Inc., Gun Owners Foundation, and California Rifle & Pistol Association,
Incorporated
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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ADAM RICHARDS, an individual;
JEFFREY VANDERMEULEN, an
16 individual; GERALD CLARK, an
individual; JESSE HARRIS, an
17 individual; ON TARGET INDOOR
SHOOTING RANGE, LLC;
18 GAALSWYK ENTERPRISES, INC.
(D/B/A/ SMOKIN’ BARREL
19 FIREARMS); GUN OWNERS OF
CALIFORNIA, INC.; GUN OWNERS
20 OF AMERICA, INC.; GUN OWNERS
FOUNDATION; CALIFORNIA RIFLE
21 & PISTOL ASSOCIATION,
INCORPORATED; and SECOND
22 AMENDMENT FOUNDATION, a
California Corporation,
23

24 Plaintiffs,

25 v.

26 GAVIN NEWSOM, in his official
capacity as Governor of the State of
California; ROBERT BONTA, in his
27 official capacity as Attorney General of
the State of California, and DOES 1-10,
28

Defendants.

Case No.: 8:23-cv-02413 JVS (KESx)

**[PROPOSED] ORDER TO SHOW
CAUSE FOR PRELIMINARY
INJUNCTION AND TEMPORARY
RESTRAINING ORDER**

1 Upon the Application of Plaintiffs Adam Richards, Jeffrey Vandermeulen,
2 Gerald Clark, Jesse Harris, On Target Indoor Shooting Range, LLC, Gaalswyk
3 Enterprises, Inc. (D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California,
4 Inc., Gun Owners of America, Inc., Gun Owners Foundation, California Rifle &
5 Pistol Association, Incorporated, and Second Amendment Foundation, the
6 declarations of Adam Richards, Jeffrey Vandermeulen, Gerald Clark, Jesse Harris,
7 Gregg Bouslog, Robert Gaalswyk, Samuel Paredes, Richard Minnich, Erich Pratt,
8 and Alan Gottlieb, and upon the pleadings on file, it is ORDERED as follows:

9 1. Defendants Gavin Newsom, in his official capacity as Governor of the
10 State of California, Robert Bonta, in his official capacity as Attorney General of the
11 State of California, must show cause before the Plaintiffs’ application in Courtroom
12 10C, on _____, at _____, of the Central District of California,
13 why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil
14 Procedure enjoining the Defendants during the pendency of this action from
15 implementation and enforcement of SB 1384 (Ca Penal Code Section 26806) ;

16 2. Sufficient reason having been shown, pending the hearing of
17 Plaintiffs’ motion for a preliminary injunction, pursuant to Rule 65 of the Federal
18 Rules of Civil Procedure, the Defendants are temporarily restrained and enjoined
19 from implementation and enforcement of SB 1384 (Ca Penal Code Section 26806);
20 and

21 3. Plaintiffs are ordered to serve on all Defendants a copy of this order
22 and all supporting pleading documents by _____.

23
24 **IT IS SO ORDERED.**

25
26 Dated: _____

Hon. James V. Selna
United States District Judge

28

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Richards, et al. v. Newsom, et al.*
Case No.: 8:23-cv-02413 JVS (KESx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**[PROPOSED] ORDER TO SHOW CAUSE FOR PRELIMINARY
INJUNCTION AND TEMPORARY RESTRAINING ORDER**

on the following parties by the following means:

Robert Bonta, California Attorney General
Office of the Attorney General
300 South Spring Street
Los Angeles, CA 90013-1230

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

X (BY OVERNIGHT MAIL) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for overnight delivery by UPS/FED-EX. Under the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for receipt on the same day in the ordinary course of business. Such envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for in accordance with ordinary business practices.

John D. Echeverria
Deputy Attorney General
john.echeverria@doj.ca.gov
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004

X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic transmission. Said transmission was reported and completed without error.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed December 21, 2023.



Laura Palmerin