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Youth Shooting Sports Association, Inc., Redlands California Youth Clay Shooting
7 Sports, Inc., California Rifle & Pistol Association, Incorporated, The CRPA
Foundation, and Gun Owners of California, Inc.

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12 Attorney for Plaintiff Second Amendment Foundation

13 **IN THE UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 JUNIOR SPORTS MAGAZINES
16 INC., RAYMOND BROWN,
CALIFORNIA YOUTH SHOOTING
17 SPORTS ASSOCIATION, INC.,
REDLANDS CALIFORNIA YOUTH
18 CLAY SHOOTING SPORTS, INC.,
CALIFORNIA RIFLE & PISTOL
19 ASSOCIATION, INCORPORATED,
THE CRPA FOUNDATION, AND
20 GUN OWNERS OF CALIFORNIA,
INC.; and SECOND AMENDMENT
21 FOUNDATION,

22 Plaintiffs,

23 v.

24 ROB BONTA, in his official capacity
as Attorney General of the State of
25 California; and DOES 1-10,

26 Defendant.

Case No.: 2:22-cv-04663-CAS (JCx)

**PLAINTIFFS' NOTICE OF
ISSUANCE OF PRELIMINARY
INJUNCTION IN SAFARI CLUB
INTERNATIONAL V. BONTA**

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE of the Order Granting Plaintiffs’ Motion for a
3 Preliminary Injunction issued on April 12, 2024, in *Safari Club International v.*
4 *Bonta*, a case that was coordinated with the above-entitled matter for oral argument
5 in the Ninth Circuit. Order Granting Plaintiffs’ Motion for a Preliminary Injunction,
6 *Safari Club Int’l v. Bonta*, No. 2:22-cv-01395-DAD-JDP (E.D. Cal. April 12, 2024),
7 ECF No. 33 (attached as **Exhibit A**). In view of the mandate issued in that case on
8 February 28, 2024, the order declares that the plaintiffs are likely to succeed on their
9 claims that California Business & Professions Code § 22949.80 is unconstitutional
10 and preliminarily enjoins enforcement of the law. *Id.*

11 The trial court in *Safari Club* issued the order after the parties filed a Joint
12 Status Report that included a proposed order as an exhibit. Joint Status Report,
13 *Safari Club Int’l*, No. 2:22-cv-01395-DAD-JDP (E.D. Cal. Mar. 20, 2024), ECF No.
14 32 (attached as **Exhibit B**); Exhibit 1 to Joint Status Report, *Safari Club Int’l*, No.
15 2:22-cv-01395-DAD-JDP (E.D. Cal. Mar. 20, 2024), ECF No. 32-1 (attached as
16 **Exhibit C**).

17 As directed by this Court at the April 8, 2024, case management conference,
18 the parties in this matter are continuing to meet, confer, and exchange positions
19 regarding Plaintiffs’ request for a preliminary injunction, as well as exploring
20 potential settlement of the entire matter.

21
22 Dated: April 18, 2024

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

23 _____
24 Anna M. Barvir
25 Counsel for Plaintiffs Junior Sports Magazines,
26 Inc., Raymond Brown, California Youth
27 Shooting Sports Association, Inc., Redlands
28 California Youth Clay Shooting Sports, Inc.,
California Rifle & Pistol Association,
Incorporated, The CRPA Foundation, and Gun
Owners of California, Inc.

1 Dated: April 18, 2024

LAW OFFICES OF DONALD KILMER, APC

2 *s/ Donald Kilmer*

3 Donald Kilmer
4 Counsel for Plaintiff Second Amendment
5 Foundation

6 **ATTESTATION OF E-FILED SIGNATURES**

7 I, Anna M. Barvir, am the ECF User whose ID and password are being used to
8 file this PLAINTIFFS’ NOTICE OF ISSUANCE OF PRELIMINARY
9 INJUNCTION IN *SAFARI CLUB INTERNATIONAL V. BONTA*. In compliance
10 with Central District of California L.R. 5-4.3.4, I attest that all signatories are
11 registered CM/ECF filers and have concurred in this filing.

12 Dated: April 18, 2024

s/ Anna M. Barvir

13 Anna M. Barvir

EXHIBIT A

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

SAFARI CLUB INTERNATIONAL, et al.,
Plaintiffs,
v.
ROB BONTA, in his official capacity as
Attorney General of the State of California,
Defendant.

No. 2:22-cv-01395-DAD-JDP

ORDER GRANTING PLAINTIFFS' MOTION
FOR A PRELIMINARY INJUNCTION

In view of the ruling of the Ninth Circuit in *Safari Club International, et al. v. Bonta* (No. 23-15199) entered on September 22, 2023, and the mandate issued on February 28, 2024, the court finds as follows:

1. Plaintiffs are likely to succeed on the merits of their claims that California Business & Professions Code § 22949.80 is unconstitutional in violation of the First and Fourteenth Amendments to the United States Constitution;
2. Plaintiffs will suffer irreparable harm if a preliminary injunction is not issued;
3. The balance of the equities tips in plaintiffs' favor;
4. The issuance of a preliminary injunction is in the public interest; and
5. No bond is appropriate under these circumstances.

////

1 Accordingly, the court **ORDERS** that pursuant to Rule 65 of the Federal Rules of Civil
2 Procedure, Defendant California Attorney General Rob Bonta and the California Department of
3 Justice, their officers, agents, servants, employees, and anyone else in active concert or
4 participation with any of the aforementioned people or entities, are hereby preliminarily enjoined
5 from enforcing California Business & Professions Code § 22949.80.

6 It is **FURTHER ORDERED** that plaintiffs shall not be required to post a bond.

7 IT IS SO ORDERED.

8 Dated: April 11, 2024

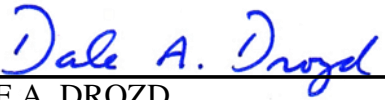
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10 DALE A. DROZD
11 UNITED STATES DISTRICT JUDGE
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EXHIBIT B

1 Michael B. Reynolds, Bar No. 174534
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2 Colin R. Higgins, Bar No. 268364
chiggins@swlaw.com
3 Cameron J. Schlagel, Bar No. 320732
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4 SNELL & WILMER L.L.P.
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5 Costa Mesa, California 92626-7689
Telephone: 714.427.7000
6 Facsimile: 714.427.7799

7 Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

11 THE UNITED STATES
12 SPORTSMEN’S ALLIANCE
FOUNDATION, an Ohio nonprofit
13 corporation; SAFARI CLUB
INTERNATIONAL, an Arizona
14 nonprofit corporation; and
CONGRESSIONAL SPORTSMEN’S
15 FOUNDATION, a Washington, D.C.
nonprofit corporation,

16 Plaintiffs,

17 v.

18 ROB BONTA, in his official capacity as
19 Attorney General of the State of
California; and DOES 1-25, inclusive,

20 Defendants.

Case No. 2:22-cv-01395- DAD-JDP

Joint Status Report

Courtroom: 4
Judge: Hon. Dale A. Drozd
Trial Date: None set
Action Filed: August 5, 2022

21
22
23 Plaintiffs and Defendant, by and through their undersigned counsel,
24 respectfully submit this joint status report pursuant to this Court’s May 17, 2023,
25 Order Granting the Parties’ Joint Motion for a Stay of Proceedings, ECF No. 29,
26 and the Ninth Circuit’s Mandate in *Safari Club International v. Bonta*, issued on
27 February 28, 2024 (*see* Case No. 23-15199, Dkt. 39).
28

Snell & Wilmer
LLP
LAW OFFICES
600 Anton Boulevard, Suite 1400
Costa Mesa, California 92626-7689
(714) 427-7000

1 Counsel for the parties have conferred about next steps in this litigation.
2 Defendant is actively considering its next steps in the litigation up to and including
3 a potential resolution of the case.

4 Plaintiffs request that this Court immediately enter a preliminary injunction
5 consistent with the Ninth Circuit’s opinion and judgment, particularly considering
6 that Defendant requires additional time to evaluate its position. Plaintiffs conferred
7 with Defendant and Defendant takes no position regarding this request. Plaintiffs’
8 [Proposed] Order Granting Plaintiffs’ Motion for Preliminary Injunction is attached
9 hereto as **Exhibit 1**. In the event the Court does not enter a preliminary injunction
10 by April 2, 2024, Plaintiffs will move the Court for an order granting a preliminary
11 injunction consistent with the opinion and judgment of the Ninth Circuit.

12 In light of these circumstances, the parties respectfully request that they file a
13 further Joint Status Report with the Court no later than April 19, 2024, updating the
14 Court of their proposed next steps.

15 DATED this 20th day of March, 2024.

16 SNELL & WILMER L.L.P.

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19 By: /s/ Cameron J. Schlagel
20 Michael B Reynolds
21 Colin R. Higgins
22 Cameron J. Schlagel
23 Attorneys for Plaintiffs

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ROB BONTA
Attorney General of California

By: /s/ Gabrielle D. Boutin
Gabrielle D. Boutin
Deputy Attorney General
Attorneys for Defendants Attorney
General Rob Bonta

EXHIBIT C

EXHIBIT 1

1 Michael B. Reynolds, Bar No. 174534
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2 Colin R. Higgins, Bar No. 268364
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3 Cameron J. Schlagel, Bar No. 320732
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Telephone: 714.427.7000
6 Facsimile: 714.427.7799

7 Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

11 THE UNITED STATES
12 SPORTSMEN’S ALLIANCE
FOUNDATION, an Ohio nonprofit
13 corporation; SAFARI CLUB
INTERNATIONAL, an Arizona
14 nonprofit corporation; and
CONGRESSIONAL SPORTSMEN’S
15 FOUNDATION, a Washington, D.C.
nonprofit corporation,

16 Plaintiffs,

17 v.

18 ROB BONTA, in his official capacity as
19 Attorney General of the State of
California; and DOES 1-25, inclusive,

20 Defendants.

Case No. 2:22-cv-01395- DAD-JDP

**[Plaintiffs’ Proposed] Order
Granting Plaintiffs’ Motion for
Preliminary Injunction**

21
22 **ORDER**

23 In view of the ruling of the Ninth Circuit in *Safari Club International, et al.*
24 *v. Bonta* (No. 23-15199) entered on September 22, 2023, and the Mandate issued
25 on February 28, 2024, the Court finds as follows:

26 1. Plaintiffs are likely to succeed on the merits of their claims that
27 California Business & Professions Code section 22949.80 is unconstitutional in
28 violation of the First and Fourteenth Amendments to the United States Constitution.

Snell & Wilmer
L.L.P.
LAW OFFICES
600 Anton Boulevard, Suite 1400
Costa Mesa, California 92626-7689
(714) 427-7000

- 1 2. Plaintiffs will suffer irreparable harm if a preliminary injunction is not
- 2 issued;
- 3 3. The balance of the equities tips in Plaintiffs' favor;
- 4 5. A preliminary injunction is in the public interest; and
- 5 6. No bond is appropriate under these circumstances.

6 Accordingly, the Court **ORDERS** that pursuant to Rule 65 of the Federal
7 Rules of Civil Procedure, Defendant California Attorney General Rob Bonta and
8 the California Department of Justice, their officers, agents, servants, employees,
9 and anyone else in active concert or participation with any of the aforementioned
10 people or entities, are hereby preliminarily enjoined from enforcing California
11 Business & Professions Code section 22949.80.

12 It is **FURTHER ORDERED** that Plaintiffs shall not be required to post a
13 bond.

14 **IT IS SO ORDERED.**

15
16 Dated: _____

17 _____
18 Hon. Dale A. Drozd
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Junior Sports Magazines, Inc., et al. v. Bonta*
Case No.: 2:22-cv-04663-CAS (JCx)

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:

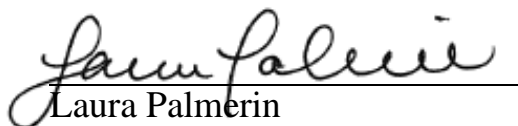
**PLAINTIFFS' NOTICE OF ISSUANCE OF PRELIMINARY INJUNCTION
IN *SAFARI CLUB INTERNATIONAL V. BONTA***

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Kevin J. Kelly, Deputy Attorney General
kevin.kelly@doj.ca.gov
300 South Spring Street, Suite 9012
Los Angeles, CA 90013
Attorney for Defendant

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

Executed April 18, 2024.



Laura Palmerin