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

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

21 Plaintiffs,

22 v.

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

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

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION TO ENFORCE THE
MANDATE AND ISSUE
PRELIMINARY INJUNCTION**

Hearing Date: June 10, 2024
Hearing Time: 10:00 a.m.
Courtroom: 8D
Judge: Christina A. Snyder

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is hereby given that on June 10, 2024, at 10:00 a.m. in Courtroom 8D
3 of the above-captioned court, located at First Street Courthouse, 350 W. First Street,
4 Los Angeles, California 90012, Plaintiffs Junior Sports Magazines Inc., Raymond
5 Brown, California Youth Shooting Sports Association, Redlands California Youth
6 Clay Shooting Sports Inc., California Rifle & Pistol Association, Inc., The CRPA
7 Foundation, Gun Owners of California, and the Second Amendment Foundation
8 (collectively, “Plaintiffs”) will move to enforce the Ninth Circuit’s judgment and
9 enter preliminary injunction under Rule 65(a) of the Federal Rules of Civil
10 Procedure. Specifically, Plaintiffs will seek an order temporarily enjoining
11 Defendant Attorney General Rob Bonta, employees, agents, successors in office,
12 and all District Attorneys, County Counsel, and City Attorneys holding office in the
13 state of California, as well as their successors in office, from Business & Professions
14 Code section 22949.80 during the pendency of this action.

15 Plaintiffs bring this motion because the Ninth Circuit has already held in this
16 case that section 22949.80 likely violates Plaintiffs’ First Amendment right to free
17 speech and that Plaintiffs have satisfied all the factors necessary for issuance of a
18 preliminary injunction.

19 This application is made on the grounds set forth in the accompanying
20 memorandum of points and authorities, the signed declaration of Anna M. Barvir
21 and the exhibit attached thereto, all pleadings and papers filed in this action, the
22 argument of counsel, and further evidence as the Court may consider at or before a
23 hearing on this motion.

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This motion is made following conferences of counsel pursuant to L.R. 7-3 which took place on April 4, 2024, and May 2, 2024. The need for the motion was also discussed in the presence of this Court during the case management conference on April 8, 2024.

Dated: May 2, 2024

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir
Anna M. Barvir
Counsel for Plaintiffs Junior Sports Magazines Incorporated, Raymond Brown, California Youth Shooting Sports Association, Inc., Redlands California Youth Clay Shooting Sports Inc., California Rifle & Pistol Association, Inc., The CRPA Foundation, and Gun Owners of California

Dated: May 2, 2024

LAW OFFICES OF DONALD KILMER, APC

s/ Donald Kilmer
Donald Kilmer
Counsel for Plaintiff Second Amendment Foundation

ATTESTATION OF E-FILED SIGNATURES

I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this PLAINTIFFS’ NOTICE OF MOTION AND MOTION TO ENFORCE THE MANDATE AND ISSUE PRELIMINARY INJUNCTION. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: May 2, 2024

s/ Anna M. Barvir
Anna M. Barvir

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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 MOTION AND MOTION TO ENFORCE THE
MANDATE AND ISSUE PRELIMINARY INJUNCTION**

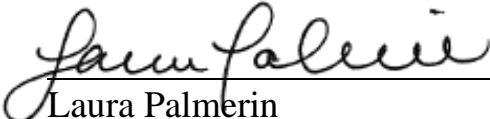
on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

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Los Angeles, CA 90013

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P.O. Box 944255
Sacramento, CA 94244-2550
Attorneys for Defendant

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

Executed May 2, 2024.



Laura Palmerin