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

13
 14 **JUNIOR SPORTS MAGAZINES
 INC. et al.,**

15 Plaintiffs,

16 v.

17
 18 **ROB BONTA, in his official capacity
 as Attorney General of the State of
 19 California et al.,**

20 Defendants.
 21

2:22-cv-04663-CAS-JC

**DEFENDANT’S LIMITED
 OPPOSITION TO MOTION TO
 ENFORCE MANDATE AND ISSUE
 PRELIMINARY INJUNCTION**

Date: June 10, 2024
 Time: 10:00 a.m.
 Courtroom: 8D
 Judge: Hon. Christina M. Snyder
 Trial Date: None set
 Action Filed: July 8, 2022

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INTRODUCTION

1
2 Defendant Attorney General Rob Bonta respectfully submits this limited
3 opposition to Plaintiffs’ Motion to Enforce Mandate and Issue Preliminary
4 Injunction.

5 “An injunction must be narrowly tailored to remedy the specific harm
6 shown.” *E. Bay Sanctuary Covenant v. Barr*, 934 F.3d 1026, 1029 (9th Cir. 2019)
7 (internal quotation omitted). Defendant opposes Plaintiffs’ motion because the
8 proposed preliminary injunction is insufficiently tailored in two respects.

9 First, consistent with the Ninth Circuit’s opinion in this matter, *Junior Sports*
10 *Mags., Inc. v. Bonta*, 80 F.4th 1109 (9th Cir. 2023), any preliminary injunction
11 should enjoin only subdivision (a) of California Business and Professions Code
12 section 22949.80. Subdivision (a) concerns advertising firearm-related products
13 to minors and is the only statutory provision that Plaintiffs have challenged in this
14 action. However, section 22949.80 includes another distinct, substantive
15 regulation in subdivision (b). Subdivision (b) is a privacy provision—as opposed
16 to an advertising one—that imposes requirements relating to the use and
17 dissemination of minors’ personal information. As described in detail below,
18 Plaintiffs have never challenged subdivision (b), and neither this Court nor the
19 Ninth Circuit has considered the validity of subdivision (b). Moreover, the
20 provisions of section 22949.80 are presumptively severable, and at no time have
21 Plaintiffs rebutted that presumption. Plaintiffs therefore failed to meet their
22 burden of “establishing the elements necessary to obtain injunctive relief” as to
23 subdivision (b). *Klein v. City of San Clemente*, 584 F.3d 1196, 1201 (9th Cir.
24 2009).

25 It is true that, since the filing of Plaintiffs’ complaint, the parties and courts
26 have often used references to “section 22949.80” or “AB 2571” as a shorthand for
27 the advertising regulations in subdivision (a). But that does not change the
28 substance of what has—and has not—been litigated in this case. Moreover,

1 subdivisions (c) through (f) of the statute inform how to interpret and enforce both
2 subdivisions (a) and (b). Thus, limiting the injunction to subdivision (a) is
3 therefore the only way to issue an injunction consistent with the Ninth Circuit’s
4 opinion in the appeal.

5 Second, in accordance with Federal Rule of Civil Procedure 65, any
6 preliminary injunction should enjoin only Defendant, his officers, agents,
7 servants, employees, and attorneys, and persons who are in active concert or
8 participation with anyone of them. *See* Fed. R. Civ. Proc. 65(d). It should not
9 specifically enjoin “all District Attorneys, County Counsel, and City Attorneys” in
10 the State, per Plaintiffs’ proposed order. *See* ECF No. 59-3 at 2.

11 Defendant respectfully asks this Court to limit any preliminary injunction in
12 these two respects.

13 BACKGROUND

14 I. CALIFORNIA BUSINESS AND PROFESSIONS CODE SECTION 22949.80

15 Section 22949.80 contains two separate subdivisions that regulate speech or
16 conduct. Subdivision (a) is the subdivision Plaintiffs challenge in this action. *See*
17 Background, section II, *infra*. It states: “A firearm industry member shall not
18 advertise, market, or arrange for placement of an advertising or marketing
19 communication offering or promoting any firearm-related product in a manner
20 that is designed, intended, or reasonably appears to be attractive to minors.” Cal.
21 Bus. & Prof. Code § 22949.80(a)(1).

22 Subdivision (b) of section 22949.80, meanwhile, does not purport to regulate
23 any advertising or similar types of communications. *Id.* § 22949.80(b). Rather, it
24 limits the use and dissemination of the personal information of minors. *Id.*

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1 Subdivision (b) states:

2 “A firearm industry member publishing material directed to
3 minors in this state or who has actual knowledge that a minor in this
4 state is using or receiving its material, shall not knowingly use,
5 disclose, compile, or allow a third party to use, disclose, or compile,
6 the personal information of that minor with actual knowledge that
7 the use, disclosure, or compilation is for the purpose of marketing
8 or advertising to that minor any firearm-related product.”

6 *Id.*

7 Section 22949.80 also includes an express severability provision. *Id.*
8 § 22949.80(f).

9 **II. THE COMPLAINT**

10 Plaintiffs filed the operative Complaint on July 8, 2022. ECF No. 1. The
11 Complaint purports to “challenge the constitutionality of California Business &
12 Professions Code section 22949.80, which makes it unlawful for any “firearm
13 industry member” to “advertise, market, or arrange for placement of an
14 advertising or marketing communication concerning any firearm-related product
15 in a manner that is designed, intended, or reasonably appears to be attractive to
16 minors.” *Id.* at 2-3 (citing Cal. Bus. & Prof. Code § 22949.80(a)(1)). The
17 Complaint regularly cites subdivision (a) of section 22949.80 (*id.* at 3, 14, 15, 16)
18 and alleges injuries and causes of action arising out of the advertising regulations
19 in that provision (*see, e.g., id.* at 30-36). The Complaint does not mention or cite
20 to subdivision (b) of the statute at any point. It also does not mention subdivision
21 (b)’s privacy regulations, or even allude to them. This Court later acknowledged
22 in its order denying the original motion for preliminary injunction that the
23 Complaint does not challenge the constitutionality of the regulations in
24 subdivision (b). ECF No. 35 at 6 n.3.

25 **III. PLAINTIFFS’ ORIGINAL MOTION FOR PRELIMINARY INJUNCTION AND THIS** 26 **COURT’S ORDER**

27 Plaintiffs filed a preliminary injunction on July 20, 2022. ECF No. 12. In
28 the motion, Plaintiffs sought to “enjoin enforcement of section 22949.80.” ECF

1 No. 12-1 at 30 (Memorandum of Points and Authorities). The motion also used
2 the term “AB 2571,” the statute’s enacting legislation. *See* ECF No. 12-1.
3 However, consistent with the Complaint, all of Plaintiffs’ arguments in the motion
4 related to the statute’s advertising regulations in subdivision (a). *See id.*; ECF No.
5 21 (Reply brief). Plaintiffs’ motion did not once mention subdivision (b) or its
6 privacy regulations. *See* ECF Nos. 12-1, 21.

7 This Court issued a minute order denying the motion for preliminary
8 injunction. ECF No. 35. The order considered whether the requirements of
9 subdivision (a) are constitutional and otherwise subject to a preliminary
10 injunction. *See id.* The order specifically concluded that subdivision (b) of
11 section 22949.80 had *not* been “challenged by plaintiffs in their complaint or
12 briefing on this motion, although [it is] evidently encompassed by plaintiffs’
13 request to “enjoin the enforcement of section 22949.80.” *Id.* at 6, n.3. The order
14 therefore did not otherwise mention or discuss subdivision (b) or its privacy
15 regulations. *See* ECF No. 35.

16 **IV. PLAINTIFF’S APPEAL AND THE NINTH CIRCUIT’S RULING**

17 Plaintiffs appealed the district court’s order to the Ninth Circuit Court of
18 Appeals. ECF No. 37. Again, Plaintiffs’ arguments concerned only the
19 advertising restrictions in subdivision (a). *See* Appellants’ Opening Br., ECF No.
20 7, *Junior Sports Mags., Inc. v. Bonta*, 80 F.4th 1109 (9th Cir. 2023) (No. 22-
21 56090), 2022 WL 17980278; Appellants’ Reply Br., ECF No. 25, *Junior Sports*,
22 80 F.4th 1109, 2023 WL 2226847. Plaintiffs made no mention of subdivision (b)
23 or its privacy regulations. Moreover, Plaintiffs did not dispute the district court’s
24 earlier conclusion that they had not challenged the constitutionality of subdivision
25 (b) in either their complaint or motion for preliminary injunction.

26 The Ninth Circuit reversed the district court’s denial of the Plaintiffs’ motion
27 for preliminary injunction and remanded “for further proceedings consistent with
28 [the] opinion.” *Junior Sports*, 80 F.4th at 1121. In the decision, the court

1 considered only whether the requirements of subdivision (a) are constitutional and
2 otherwise subject to a preliminary injunction. *See Junior Sports*, 80 F.4th 1109.
3 The court did not mention, allude to, or consider the constitutionality of
4 subdivision (b)'s privacy regulations or whether that subdivision is subject to a
5 preliminary injunction. *See id.* The court also took no issue with this Court's
6 determination that Plaintiffs had not challenged subdivision (b) in their Complaint
7 or motion. *See id.*

8 **V. RECENT PROCEEDINGS IN *SAFARI CLUB V. BONTA***

9 Following the Ninth Circuit's ruling in Plaintiffs' appeal, the same panel
10 issued a short Memorandum in the related preliminary injunction appeal of *Safari*
11 *Club International v. Bonta*. No. 23-15199, 2023 WL 6178500 (9th Cir. Sept. 22,
12 2023), in which Attorney General Bonta is also the Defendant. The Memorandum
13 stated, "For the reasons outlined in *Junior Sports Magazines v. Bonta*, No. 22-
14 56090 (9th Cir. Sept. 13, 2023), we reverse the denial of preliminary injunction
15 and remand for further proceedings consistent with that opinion." *Id.* at *1.

16 Thereafter, the parties in *Safari Club* submitted to the district court a Joint
17 Status Report, in which the plaintiffs asked the Court to issue a preliminary
18 injunction "consistent with the Ninth Circuit's opinion and judgment." Joint
19 Status Report at 2, ECF No. 32, *Safari Club Int'l v. Bonta*, No. 2:22-cv-01395-
20 DAD-JDP (E.D. Cal. Mar. 20, 2024). Defendant took no position on that request.
21 *Id.* When, after a brief period, no preliminary injunction had issued, Defendant
22 informed the *Safari Club* plaintiffs that he would not oppose a new motion for
23 preliminary injunction, but only if the motion requested "an injunction consistent
24 with the substance and scope of the Ninth Circuit's ruling." *See* Decl. of Gabrielle
25 Boutin in Supp. of Mtn, for an Order Clarifying Prelim. Inj. ¶ 4, ECF No. 35-1,
26 *Safari Club Int'l v. Bonta*, No. 2:22-cv-01395-DAD-JDP (E.D. Cal. May 15,
27 2024). Defendant specifically explained, "[f]or example, we assume you will
28 request an injunction only of subsection (a) of Business & Professions Code

1 section 22949.80, since that is the only restriction on speech that the 9th Circuit
2 addressed in its opinion [in *Junior Sports*].” *Id.*

3 Before the *Safari Club* plaintiffs filed a new motion for preliminary
4 injunction, however, the district court issued an Order Granting Pls’ Mtn. for a
5 Prelim. Inj.. Order Granting Plaintiffs’ Motion for a Preliminary Injunction, ECF
6 No. 33, *Safari Club Int’l v. Bonta*, No. 2:22-cv-01395-DAD-JDP (E.D. Cal. April
7 12, 2024). The Order enjoins enforcement of “California Business & Professions
8 Code § 22949.80” by “Defendant California Attorney General Rob Bonta and the
9 California Department of Justice, their officers, agents, servants, employees, and
10 anyone else in active concert or participation with any of the aforementioned
11 people or entities.” *Id.*

12 On May 15, 2024, Defendant filed a Motion for an Order Clarifying the
13 Preliminary Injunction. *See* Mem. of P. & and A. Supp. of Mtn. for an Order
14 Clarifying Prelim. Inj., ECF No. 35, *Safari Club Int’l v. Bonta*, No. 2:22-cv-
15 01395-DAD-JDP (E.D. Cal. May 15, 2024). There, Defendant has asked the court
16 to clarify that the existing injunction enjoins the enforcement only of subdivision
17 (a).¹ *See id.* at 1. That motion is set for hearing on July 2, 2024. *Id.*

18 ARGUMENT

19 I. ANY PRELIMINARY INJUNCTION SHOULD ENJOIN ONLY SUBDIVISION (A) OF 20 SECTION 22949.80.

21 A plaintiff has the burden to show they are entitled to a preliminary
22 injunction of the scope that they seek. *See Klein v. City of San Clemente*, 584
23 F.3d 1196, 1201 (9th Cir. 2009) (the plaintiff bears the burden of “establishing the
24 elements necessary to obtain injunctive relief”); *E. Bay Sanctuary Covenant v.*

25 ¹ Prior to Plaintiffs’ filing of the instant motion in this case, Defendant
26 advised them that he was planning to ask the court in *Safari Club* to clarify that
27 its preliminary injunction was limited to subdivision (a) of section 22949.80. *See*
28 Pls’ Mem. of P. & and A. Supp. of Mtn. to Enforce Mandate & Issue a Prelim.
Inj. (“Mtn.”), ECF No. 59-1, at 9. Defendant also explained to Plaintiffs the
reasoning for this limited opposition to their motion. *Id.* at 7.

1 *Barr*, 934 F.3d 1026, 1029 (9th Cir. 2019) (“[a]n injunction must be narrowly
2 tailored to remedy the specific harm shown” (internal quotation omitted)); *see*
3 *also Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008) (injunctive
4 relief is an “extraordinary remedy that may only be awarded upon a clear showing
5 that the plaintiff is entitled to such relief”).

6 Here, Plaintiffs have not shown that they are entitled to any injunction of
7 subdivision (b) of section 22949.80. As this Court previously observed, Plaintiffs
8 did not challenge the constitutionality of the privacy regulations in subdivision (b)
9 in either their Complaint or their original preliminary injunction motion. ECF No.
10 35 at 6 n.3. Plaintiffs did not challenge subdivision (b)’s constitutionality in the
11 Ninth Circuit appeal. And, at no stage have Plaintiffs established any of the
12 elements necessary for injunctive relief as to subdivision (b).

13 Instead, Plaintiffs’ arguments and showing has been limited to the
14 advertising regulations in subdivision (a), which is presumptively severable from
15 the rest of the statute. Cal. Bus. & Prof. Code § 22949.80(f) (severability
16 provision). *See Sam Francis Found. v. Christies, Inc.*, 784 F.3d 1320, 1325 (9th
17 Cir. 2015) (“Severability is . . . a matter of state law” (ellipsis in original)); *Vivid*
18 *Ent., LLC v. Fielding*, 774 F.3d 566, 574 (9th Cir. 2014) (“California law directs
19 courts to consider first the inclusion of a severability clause in the legislation . . .
20 ‘The presence of such a clause establishes a presumption in favor of severance’
21 (quoting *Cal. Redev. Ass’n v. Matosantos*, 53 Cal.4th 231, 270 (2011)). Although
22 this is a rebuttable presumption, Plaintiffs have never attempted to meet their
23 burden to rebut the presumption. *See Santa Barbara Sch. Dist. v. Superior Court*,
24 13 Cal.3d 315, 331 (1975) (“Although not conclusive, a severability clause
25 normally calls for sustaining the valid part of the enactment”).

26 The Ninth Circuit’s opinion and mandate does not require this Court to
27 preliminarily enjoin subdivision (b). Rather, it requires this Court to conduct
28 further proceedings “consistent with” its opinion. *Junior Sports Mags.*, 80 F.4th

1 at 1121. Like this Court’s appealed order, the Ninth Circuit opinion discusses and
2 analyzes *only* the advertising regulations in subdivision (a). It does not consider
3 whether, much less rule that, the privacy regulations in subdivision (b) are likely
4 unconstitutional or otherwise subject to a preliminary injunction. It is true that the
5 Ninth Circuit opinion, like the filings of this Court and the parties before it,
6 generally refers at times to “section 22949.80” or “AB 2571.” But consistent with
7 the scope of this action, the parties and the courts have simply used those phrases
8 as shorthand for the advertising regulations in subdivision (a). *See, e.g., Junior*
9 *Sports Mags.*, 80 F.4th at 1113. Indeed, the Ninth Circuit described the
10 challenged regulation as follows:

11 AB 2571, as later amended by AB 160, is codified at § 22949.80 of the
12 California Business and Professions Code. The statute mandates that “[a]
13 firearm industry member shall not advertise, market, or arrange for
14 placement of an advertising or marketing communication offering or
15 promoting any firearm-related product in a manner that is designed,
intended, or reasonably appears to be attractive to minors.” Cal. Bus. &
Prof. Code § 22949.80(a)(1).

16 *Id.* at 1114; *see also id.* at 1113 (“this case is about whether California can ban a
17 truthful ad about firearms used legally by adults and minors—just because the ad
18 “reasonably appears to be attractive to minors”). No phrase or label used for
19 rhetorical convenience can change the substance of the Court’s legal discussion
20 and analysis.²

21 ² Defendant’s own references in prior briefs to “section 22949.80” or
22 subdivisions (c) and (e) of the statute are irrelevant to the issue of whether
23 Plaintiffs have met their burden to show that subdivision (b) should be
24 preliminarily enjoined. *See* Mtn. at 8-9. Even if those references were relevant,
25 they do not indicate that Defendant thought that Plaintiffs challenged subdivision
26 (b), despite Plaintiffs’ failure to mention, much less discuss, that provision in their
27 Complaint or briefs. Each of Defendant’s references was made to support his
28 argument that *subdivision (a)*’s advertising regulations are constitutional and not
subject to a preliminary injunction. *See, e.g.,* Defendant-Appellee’s Answering
Br. at 4-5, 15-16, 20, 34, ECF No. 20, *Junior Sports*, 80 F.4th 1109 (9th Cir.
2023) (No. 22-56090), 2023 WL 1768545; Pet’n for Rehearing En Banc at 3-4,
ECF No. 49, *Junior Sports*, 80 F.4th 1109.

1 Plaintiffs argue that they are entitled to a preliminary injunction of
2 subdivision (b) because their proposed order in support of their original motion for
3 preliminary injunction sought to enjoin enforcement of “AB 2571, codified at
4 Business & Professions Code section 22949.80” and the Ninth Circuit did not
5 suggest that narrower relief is appropriate. *See* Mtn. at 8. However, this Court
6 denied that motion, rejected the proposed order, and recognized that Plaintiffs had
7 not challenged subdivision (b)’s constitutionality. Later, the Ninth Circuit simply
8 determined that the advertising regulations in subdivision (a) were properly
9 subject to a preliminary injunction and that this Court should conduct proceedings
10 consistent with that determination.³ The Ninth Circuit did *not* conclude that this
11 Court should have adopted Plaintiffs’ previously-submitted proposed order. *See*
12 *Junior Sports*, 80 F.4th 1109.

13 Plaintiffs also argue that subdivision (b) should be enjoined because it is
14 “wholly reliant on the marketing of firearm industry members that the Ninth
15 Circuit has found to be protected speech.” Mtn. at 10. But during the preliminary
16 injunction proceedings, Plaintiffs never explained, much less proved, why this is
17 so. Plaintiffs do not claim to have submitted any evidence or cited any legal
18 authorities on this point. (Had they done so, then Defendant would have fairly
19 had the opportunity to rebut those submissions and citations.) Logic alone does
20 not dictate that subdivision (b)’s privacy regulations necessarily prevent Plaintiffs
21 from speaking as described in subdivision (a). For example, why do Plaintiffs
22 need to “knowingly . . . disclose” to third parties the personal information of a
23 minor in order to publish firearm advertisements directed to minors? *See* Cal.
24 Bus. & Prof. Code § 22949.80(b). And, why must publications knowingly use the

25
26 ³ Indeed, after the Ninth Circuit issued the opinion, but before mandate
27 issued, the Ninth Circuit panel rejected Plaintiffs’ request that it immediately
28 issue a preliminary injunction. *See* Motion for Injunction Pending Appeal, ECF
No. 44, *Junior Sports*, 80 F.4th 1109 (9th Cir. 2023) (No. 22-56090); Order, ECF
No. 48, *Junior Sports*, 80 F.4th 1109 (9th Cir. 2023) (No. 22-56090).

1 personal information of minors, instead of their parents with whom they live? *See*
2 *id.* Plaintiffs do not attempt to address these or similar questions, and the answers
3 are not obvious. In any event, neither this Court nor the Ninth Circuit has
4 determined that subdivisions (a) and (b) must stand or fall together. Indeed, the
5 Legislature did not think so, having included a severability clause in AB 2571.

6 Finally, there is no need to preliminarily enjoin subdivisions (c) through (f)
7 of section 22949.80. *See Mtn.* at 10. Again, a preliminary injunction must be
8 narrowly-tailored. *E. Bay Sanctuary Covenant v. Barr*, 934 F.3d 1026, 1029 (9th
9 Cir. 2019). Unlike subdivisions (a) and (b), subdivisions (c) through (f) do not
10 proscribe any speech or conduct. Rather, they simply inform how subdivisions (a)
11 and (b) are to be interpreted and enforced. *See Cal. Bus. & Prof*
12 *Code* § 22949.80(c) (providing definitions of terms); *id.* § 22949.80(d) (describing
13 conduct *not* affected by the statute); *id.* § 22949.80(e) (describing how the statute
14 is enforced); *id.* 22949.80(f) (severability provision).

15 **II. THE PERSONS SUBJECT TO ANY PRELIMINARY INJUNCTION SHOULD BE**
16 **LIMITED TO THOSE ENUMERATED IN FEDERAL RULE OF CIVIL PROCEDURE**
17 **65(D)**

18 If this Court issues a preliminary injunction, it should also limit the scope of
19 the persons bound by the injunction. Under Federal Rule of Civil Procedure
20 65(d), a preliminary injunction binds only the following persons who receive
21 actual notice of the injunction: “(A) the parties; (B) the parties’ officers, agents,
22 servants, employees, and attorneys; and (C) other persons who are in active
23 concert or participation with anyone described in Rule 65(d)(2)(A) or (B).” Fed.
24 R. Civ. P. 65(d); *see also Regal Knitwear Co. v. NLRB*, 324 US 9, 13, 65 (1945)
25 (courts may not grant injunction “so broad as to make punishable the conduct of
26 persons who act independently and whose rights have not been adjudged
27 according to law”).

28 Here, in their proposed order, Plaintiffs seek to enjoin the conduct of
“Defendant, his employees, agents, successors in office, and all District Attorneys,

1 County Counsel, and City Attorneys holding office in the state of California, as
2 well as their successors in office.” ECF No. 59-3 at 2. This Court should decline
3 to enjoin the conduct of this list of persons, as many are not parties to this action.
4 The Court should instead issue the injunction against only those persons identified
5 in Rule 65(d)—Defendant, his officers, agents, servants, employees, and
6 attorneys, and other persons in active concert with them. Plaintiffs have not
7 provided any legal authority or argument for enjoining any persons other than
8 those listed in Rule 65(d).

9 **CONCLUSION**

10 For the reasons described above, Defendant respectfully submits that any
11 preliminary injunction issued by this Court should enjoin only enforcement of
12 section 22949.80, subdivision (a), and enjoin only those persons enumerated in
13 Federal Rule of Procedure 65(d).

14 Dated: May 20, 2024

Respectfully submitted,

15
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17 MARK R. BECKINGTON
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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Defendant Rob Bonta, in his official capacity as Attorney General for the State of California, certifies that this brief contains 3364 words, which complies with the word limit of L.R. 11-6.1.

Dated: May 20, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California

s/ Gabrielle D. Boutin
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Deputy Attorney General
*Attorneys for Defendant Rob Bonta, in
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General of the State of California)*

CERTIFICATE OF SERVICE

Case Name: *Junior Sports Magazines Inc., et
al. v. Rob Bonta, et al.*

Case Number: 2:22-cv-04663-CAS-JC

I hereby certify that on May 20, 2024, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DEFENDANT'S LIMITED OPPOSITION TO MOTION TO ENFORCE MANDATE AND ISSUE PRELIMINARY INJUNCTION

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 May 20, 2024, at Los Angeles, California.

Dora Mora
Declarant

Dora Mora
Signature