

1 C.D. Michel – SBN 144258
Jason A. Davis – SBN 224250
2 Anna M. Barvir – SBN 268728
Konstadinos T. Moros – SBN 306610
3 MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd, Suite 200
4 Long Beach, CA 90802
Telephone: (562) 216-4444
5 Facsimile: (562) 216-4445
Email: CMichel@michellawyers.com

6 Attorneys for Petitioners-Plaintiffs
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

10 FRANKLIN ARMORY, INC., et al.,

11 Petitioners-Plaintiffs,

12 v.

13 CALIFORNIA DEPARTMENT OF JUSTICE,
14 et al.,

15 Respondents-Defendants.
16

Case No.: 20STCP01747

[Assigned for all purposes to the Honorable
Daniel S. Murphy; Department 32]

**STIPULATION OF THE PARTIES RE:
EXTENSION OF TIME TO FILE
MOTION TO STRIKE OR TAX COSTS;
[PROPOSED] ORDER**

Action Filed: May 27, 2020

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20 Petitioners-Plaintiffs Franklin Armory, Inc., and California Rifle & Pistol Association
21 (“Plaintiffs”) and Respondents-Defendants California Department of Justice and California Attorney
22 General, (“Defendants”) through their respective counsel, stipulate and agree to the following:

23 WHEREAS, this Court granted Defendants’ Motion for Summary Judgment on July 11, 2024;

24 WHEREAS, Defendants submitted a Proposed Judgment on July 12, 2024;

25 WHEREAS, this Court entered the final judgment in this action on July 12, 2024;

26 WHEREAS, the Notice of Entry of Judgment was served on Plaintiffs by mail on July 12, 2024;

27 WHEREAS, Defendants electronically served Plaintiffs with a Memorandum of Costs
28 (Summary) on July 18, 2024;

1 WHEREAS, pursuant to Rule 3.1700(b)(1), any motion to strike or tax costs is currently due on
2 or before August 6, 2024;

3 WHEREAS, Anna M. Barvir, the lead counsel for Plaintiffs, will be out of town from July 26,
4 2024, to August 6, 2024, on a prepaid, non-refundable vacation;

5 WHEREAS, pursuant to Rule 3.1700(b)(3) of the California Rules of Court, the parties are
6 within the time period wherein they are allowed to extend, by written stipulation, the otherwise
7 applicable deadlines for filing memoranda of costs and any motion to strike or tax costs;

8 WHEREAS, this stipulation is entered into in good faith for the reasons described herein and not
9 merely for the purpose of delay.

10 THEREFORE, based on the foregoing, the parties hereby agree and stipulate as follows:

11 1. The deadline to file and serve any motion to strike or tax costs is extended by 14 days to
12 August 20, 2024.

13 **IT IS SO STIPULATED.**

14 Date: July 25, 2024

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Petitioner-Plaintiff

18 Date: July 25, 2024

ROB BONTA

Attorney General of California

s/ Andrew Adams

ANDREW ADAMS

Attorney for Respondents-Defendants

1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties dated July 25, 2024, and good cause appearing, the
3 Court hereby extends the relevant deadline as follows:

4 2. The deadline to file and serve any motion to strike or tax costs is extended by 14 days to
5 August 20, 2024.

6 **IT IS SO ORDERED.**

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8 Date: _____

9 Honorable Daniel S. Murphy
10 Judge of the Superior Court
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I
5 am over the age eighteen (18) years and am not a party to the within action. My business address is 180
6 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

7 On July 25, 2024, I served the foregoing document(s) described as

8 **STIPULATION OF THE PARTIES RE: EXTENSION OF TIME TO FILE MOTION TO
9 STRIKE OR TAX COSTS; [PROPOSED] ORDER**

10 on the interested parties in this action by placing
11 [] the original
12 [X] a true and correct copy
13 thereof by the following means, addressed as follows:

14 Kenneth G. Lake
15 Deputy Attorney General
16 Email: Kenneth.Lake@doj.ca.gov
17 Andrew Adams
18 Email: Andrew.Adams@doj.ca.gov
19 California Department of Justice
20 300 South Spring Street, Suite 1702
21 Los Angeles, CA 90013

22 *Attorney for Respondents-Defendants*

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

25 I declare under penalty of perjury under the laws of the State of California that the foregoing is
26 true and correct.

27 Executed on July 25, 2024, at Long Beach, California.

28 

Laura Palmerin