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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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13 **ADAM RICHARDS, et al.,**
14 Plaintiffs,
15 v.
16 **GAVIN NEWSOM, in his official**
capacity as Governor of California, et
17 **al.,**
18 Defendants.

Case No.: 8:23-cv-02413 JVS (KESx)
**STIPULATION RE: ORDER
SETTING RULE 26(f)
SCHEDULING CONFERENCE**
Judge: The Honorable James V.
Selna
Action Filed: 12/19/2023

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22 Pursuant to Local Rule 8-3, Plaintiffs and Defendant in the above-captioned
23 action (collectively, “the Parties”), through their respective attorneys of record,
24 hereby stipulate and request as follows:

- 25 1. Plaintiffs filed their Complaint on December 19, 2023 and served
26 Defendants on December 22, 2023.
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1 2. On March 1, 2024, the Court issued a ruling denying Plaintiffs’
2 application for preliminary injunction finding that, among other things, Plaintiffs
3 failed to show a likelihood of success on the merits of their claims (ECF No. 28).

4 3. Upon stipulation among the parties and order of the Court, Plaintiffs filed
5 the operative Amended Complaint on June 28, 2024 (ECF No. 39).

6 4. On August 2, 2024, Defendant filed a Motion to Dismiss the Amended
7 Complaint (ECF No. 41), which, if granted, would dispose of this entire action
8 without the need for discovery or any further proceedings. Plaintiffs’ opposition to
9 the Motion to Dismiss is due on September 5, 2024; Defendant’s reply is due on
10 September 27, 2024; and a hearing on the motion is set for October 7, 2024, at 1:30
11 p.m. (*See* ECF No. 38.)

12 5. Also on August 2, 2024, the Court issued an Order Setting Rule 26(f)
13 Scheduling Conference, setting the Rule 26(f) conference also for October 7, 2024,
14 and ordering, among other things, the parties’ filing of the Joint Rule 26(f) Report.
15 (ECF No. 42.)

16 6. The parties jointly request that the Court take off calendar the Rule 26(f)
17 Scheduling Conference and hold in abeyance the related dates and deadlines until
18 after the Court rules on Defendant’s pending motion to dismiss, which, if granted,
19 would dispose of this entire action without the need for discovery or any further
20 proceedings. Good cause exists for this request, which would promote judicial
21 efficiency and economy and save resources of the parties and the Court.

22 7. If the Court’s ruling on the motion to dismiss does not resolve this case in
23 its entirety, the parties request 30 days after that ruling to meet and confer and
24 submit a case status update to the Court.

25 8. A proposed order will be lodged with the Court concurrently with this
26 motion.

27 **IT IS SO STIPULATED.**

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Dated: August 22, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MARK BECKINGTON
Supervising Deputy Attorney General

*/s/ Todd Grabarsky*¹
TODD GRABARSKY
Deputy Attorney General
*Attorneys for Defendant Attorney
General Rob Bonta in his official
capacity*

Dated: August 22, 2024

MICHEL & ASSOCIATES, P.C

/s/ Joshua Robert Dale
JOSHUA ROBERT DALE
Attorneys for Plaintiffs

SA2023306691

¹ I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2024, I electronically filed the foregoing document and any attachments thereto with the Clerk of the Court by using the CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: August 22, 2024

/s/ Todd Grabarsky
TODD GRABARSKY