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9 *Attorneys for Defendant Nicholas Maduros, in his
official capacity as Director of the California
Department of Tax and Fee Administration*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN DIEGO

14 DANIELLE JAYMES, JOSHUAH GERKEN,
15 SECOND AMENDMENT FOUNDATION,
16 FIREARMS POLICY COALITION,
17 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, and NATIONAL RIFLE
ASSOCIATION OF AMERICA,

18 Plaintiffs,

19 v.

20 NICOLAS MADUROS, in his official capacity
21 as Director of the California Department of Tax
and Fee Administration,
22

23 Defendant.

Case No. 37-2024-00031147-CU-MC-CTL

**STIPULATION EXTENDING TIME FOR
DEFENDANT NICOLAS MADUROS TO
FILE RESPONSE TO PLAINTIFFS'
AMENDED COMPLAINT; [PROPOSED]
ORDER**

Dept: C-70
Judge: The Honorable Carolyn Caietti
Trial Date: None Set
Action Filed: July 2, 2024

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25 Plaintiffs Danielle Jaymes, Joshuah Gerken, Poway Weapons & Gear, Inc. and North
26 County Shooting Center, Inc., Second Amendment Foundation, Firearms Policy Coalition,
27 California Rifle & Pistol Association, National Rifle Association of America (Plaintiffs) and

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1 Defendant Nicolas Maduros, in his official capacity as Director of the California Department of
2 Tax and Fee Administration (Defendant) agree and stipulate to the following:

3 On July 2, 2024, Plaintiffs filed the original Complaint against Defendant in the Superior
4 Court of the State of California, County of San Diego.

5 On September 6, 2024, Defendant's counsel notified Plaintiffs' counsel of Defendant's
6 intention to file a demurrer to the Complaint, and Plaintiffs' counsel indicated that Plaintiffs
7 intended to file an amended complaint.

8 On December 6, 2024, Plaintiffs filed and served the Amended Complaint on Defendant,
9 adding new plaintiffs and two causes of action.

10 Under Code of Civil Procedure section 430.40, Defendant has 30 days to demur to the
11 Amended Complaint.

12 Defendant requires additional time to respond to the Amended Complaint.

13 Defendant has requested, and Plaintiff has agreed, to extend the time for Defendant to file
14 his response to the Amended Complaint to February 18, 2025.

15 ACCORDINGLY, the parties, through their counsel, stipulate and respectfully request that
16 the Court order as follows:

17 Defendant shall be granted an extension of time to February 18, 2025 to file a response to
18 Plaintiffs' Amended Complaint.

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IT IS SO STIPULATED.

Dated: December 23, 2024

Respectfully submitted,

MICHEL & ASSOCIATES
COOPER & KIRK, PLLC

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JOSHUA ROBERT DALE
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*Attorneys for Plaintiffs Danielle Jaymes,
Joshuah Gerken, Second Amendment
Foundation, Firearms Policy Coalition,
California Rifle & Pistol Association, and
National Rifle Association of America*

Dated: December 23, 2024

Respectfully submitted,

ROB BONTA
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Attorneys for Defendant Nicolas Maduro

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[PROPOSED] ORDER

The Court, having read and considered the stipulation, and good cause appearing,
IT IS HEREBY ORDERED that Defendant Nicolas Maduros shall be granted an extension of
time until February 18, 2025, to file a response to Plaintiffs' amended complaint.

Dated: _____

Hon. Carolyn Caietti
Judge of the Superior Court

DECLARATION OF SERVICE BY E-MAIL and U.S. MAIL

Case Name: **Jaymes et al. v. Maduros**
No.: **37-2024-00031147-CU-MC-CTL**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On December 26, 2024, I served the attached

- **STIPULATION EXTENDING TIME FOR DEFENDANT NICOLAS MADUROS TO FILE RESPONSE TO PLAINTIFFS' AMENDED COMPLAINT; [PROPOSED] ORDER**

by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

David H. Thompson
Peter A. Patterson
Megan M. Wold
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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 December 26, 2024, at Sacramento, California.

F. Saunders
Declarant

/s/ F. Saunders
Signature

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