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7 Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc. (D/B/A  
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13

14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 ADAM RICHARDS, et al.,  
17 Plaintiffs,  
18 v.  
19 GAVIN NEWSOM, et al.,  
20 Defendants.

Case No.: 8:23-cv-02413 JVS (KESx)

**PLAINTIFFS’ REQUEST FOR  
ENTRY OF JUDGMENT  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 58(d)**

Courtroom: 10C  
Judge: Hon. James V. Selna

1 Pursuant to Federal Rule of Civil Procedure 58(d), Plaintiffs Adam Richards,  
2 Jeffrey Vandermeulen, Gerald Clark, Jesse Harris, On Target Indoor Shooting  
3 Range, LLC, Gaalswyk Enterprises, Inc., d/b/a Barrel Firearms, Gun Owners of  
4 California, Inc., Gun Owners of America, Inc., Gun Owners Foundation, California  
5 Rifle & Pistol Association, Incorporated and Second Amendment Foundation  
6 (“Plaintiffs”) submit this Request for Entry of Judgment as follows:

7 1. On October 16, 2024, the Court granted Defendant Rob Bonta’s motion  
8 to dismiss the amended complaint, dismissing all claims without prejudice and  
9 granting the Plaintiffs leave to amend on or before November 6, 2024.

10 2. Plaintiffs chose to stand on their complaint and not to amend, and on  
11 November 12, 2024, Defendant filed a notice informing this Court that Plaintiffs had  
12 not filed an amended complaint by November 6, 2024.

13 3. This Court’s dismissal order, dispensing with every claim and prayer  
14 for relief, provides grounds for entry of judgment and no further action is necessary  
15 before the Court can enter judgment pursuant to Rule 58(a).

16 4. For these reasons, Plaintiffs respectfully ask this Court to enter final  
17 judgment pursuant to Rule 58(d). A proposed judgment is attached hereto.

18 Dated: January 27, 2025

**MICHEL & ASSOCIATES, P.C.**

*s/ Anna M. Barvir*

Anna M. Barvir  
Attorneys for Plaintiffs Adam Richards,  
Jeffrey Vandermeulen, Gerald Clark, Jesse  
Harris, On Target Indoor Shooting Range,  
LLC, Gaalswyk Enterprises, Inc. (D/B/A  
Smokin’ Barrel Firearms), Gun Owners of  
California, Inc., Gun Owners of America, Inc.,  
Gun Owners Foundation, and California Rifle  
& Pistol Association, Incorporated

25 Dated: January 27, 2025

**LAW OFFICES OF DONALD KILMER, APC**

*s/ Donald Kilmer*

Donald Kilmer  
Attorney for Plaintiff The Second Amendment  
Foundation

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**ATTESTATION OF E-FILED SIGNATURES**

I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this PLAINTIFFS’ REQUEST FOR ENTRY OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 58(d). 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: January 27, 2025

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: *Richards, et al. v. Newsom, et al.*  
Case No.: 8:23-cv-02413 JVS (KESx)

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' REQUEST FOR ENTRY OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 58(d)**

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

Todd Grabarsky  
Deputy Attorney General  
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Telephone: (213) 269-6044  
*Attorneys for Defendants*

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

Executed January 27, 2025.

  
\_\_\_\_\_  
Laura Fera