

1 ROB BONTA  
Attorney General of California  
2 MARK R. BECKINGTON  
Supervising Deputy Attorney General  
3 ROBERT L. MEYERHOFF, SBN 298196  
Deputy Attorney General  
4 State Bar No. 298196  
300 South Spring Street, Suite 1702  
5 Los Angeles, CA 90013-1230  
Telephone: (213) 269-6177  
6 Fax: (916) 731-2144  
E-mail: Robert.Meyerhoff@doj.ca.gov  
7 *Attorneys for Rob Bonta in his official capacity as  
Attorney General of the State of California*

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
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13 **RENO MAY, ET AL.;**

14 Plaintiffs,

15 v.

16 **ROB BONTA, IN HIS OFFICIAL  
CAPACITY AS ATTORNEY GENERAL  
17 OF CALIFORNIA,**

18 Defendant.  
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Case No. 8:23-cv-01696-MRA-ADS

**SECOND STIPULATION TO EXTEND  
DEFENDANT’S TIME TO RESPOND  
TO COMPLAINT**

Courtroom: 10B  
Judge: Hon. Mónica Ramírez Almadani  
Action Filed: September 26, 2023

1 Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary Brennan, Tony  
2 Barretto, Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Jose Flores,  
3 Andrew Harms, Dr. Sheldon Hough, DDS, The Second Amendment Foundation,  
4 Gun Owners of America, Gun Owners Foundation, Gun Owners of California, Inc.,  
5 the Liberal Gun Club, Inc., and the California Rifle & Pistol Association,  
6 Incorporated (collectively, Plaintiffs) and Defendant Rob Bonta in his official  
7 capacity as Attorney General of California (Defendant, and together with Plaintiffs,  
8 the Parties) hereby stipulate and agree as follows:

9 **WHEREAS**, on September 12, 2023, Plaintiffs filed their Complaint (Dkt. 1)  
10 in this matter;

11 **WHEREAS**, on September 29, 2023, Plaintiffs filed their Motion for  
12 Preliminary Injunction (Dkt. 13);

13 **WHEREAS**, on October 11, 2023, the Court entered the Parties' stipulation to  
14 extend Defendant's time to answer or otherwise respond to the Complaint until 21  
15 days after the Court ruled on Plaintiffs' Motion for Preliminary Injunction (Dkt.  
16 19);

17 **WHEREAS**, on December 20, 2023, the Court issued its Order and  
18 Preliminary Injunction (Dkts. 45-46);

19 **WHEREAS**, on December 22, 2023, Defendant filed its notice of appeal  
20 appealing the Order and Preliminary Injunction (Dkt. 48);

21 **WHEREAS**, the Court entered the Parties' stipulation to extend Defendant's  
22 time to answer or otherwise respond to the Complaint until 21 days after the Ninth  
23 Circuit's resolution of Defendant's appeal of the Court's Order and Preliminary  
24 Injunction (Dkt. 51);

25 **WHEREAS**, on January 23, 2025, the Ninth Circuit issued its mandate in  
26 Defendant's appeal of the Court's Order and Preliminary, and thus Defendant's  
27 deadline to respond to the Complaint is now February 13, 2025 (Dkt. 61);  
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1           **WHEREAS**, good cause exists for this extension because (a) this case  
2 presents a constitutional challenge to numerous provisions of California Penal Code  
3 26230(a), and (b) lead counsel for Defendant, Robert L. Meyerhoff, recently  
4 returned from parental leave on January 24, 2025;

5           **WHEREAS**, the Parties agree to extend Defendant’s deadline to answer or  
6 otherwise respond to the Complaint to March 13, 2025, and, should Plaintiff file an  
7 Amended Complaint, the Parties agree to extend Defendant’s deadline to respond to  
8 that Amended Complaint March 13, 2025, or 21 days after the filing of the  
9 Amended Complaint, whichever is later;

10           **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the  
11 Parties that, with the Court’s permission:

- 12           • Defendant’s deadline to answer or otherwise respond to the Complaint is  
13           extended until March 13, 2025, and, should Plaintiff file an Amended  
14           Complaint, Defendant’s deadline to respond to that Amended Complaint is  
15           extended until March 13, 2025, or 21 days after the filing of the Amended  
16           Complaint, whichever is later.

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1 Dated: January 30, 2025

Respectfully submitted,

2 ROB BONTA  
3 Attorney General of California  
4 MARK R. BECKINGTON  
5 Supervising Deputy Attorney General

6 /s/ Robert L. Meyerhoff  
7 ROBERT L. MEYERHOFF  
8 Deputy Attorney General

*Attorneys for Rob Bonta in his official  
capacity as Attorney General for the  
State of California*

9 Dated: January 30, 2025

Respectfully submitted,

10 /s/ Konstadinos T. Moros  
11 C.D. MICHEL  
12 JOSHUA ROBERT DALE  
13 ALEXANDER A. FRANK  
14 KONSTADINOS T. MOROS

Michel & Associates, P.C.

*Attorneys for Plaintiffs Lance Boland,  
Mario Santellan, Reno May, Jerome  
Schammel, and the California Rifle &  
Pistol Association, Incorporated*

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