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*Attorney for Defendants Los Angeles County
Sheriff's Department and Sheriff Robert Luna*

(additional counsel listed below)

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

CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED; et
al.,

Plaintiffs,

v.

LOS ANGELES COUNTY SHERIFF'S
DEPARTMENT; et al.,

Defendants.

Case No. 2:23-cv-10169-SPG-ADS

**JOINT STIPULATED REQUEST
FOR EXTENSION OF CASE
DEADLINES**

Judge: Hon. Sherilyn Peace Garnett
Action Filed: December 4, 2023

1 TO THE HONORABLE COURT, BY AND THROUGH THE PARTIES’
2 RESPECTIVE ATTORNEYS OF RECORD, THE PARTIES HEREBY JOINTLY
3 STIPULATE AS FOLLOWS:

4 WHEREAS, on November 19, 2024, the Court issued the Civil Pretrial
5 Schedule and Trial Order (ECF No. 72 (the “Order”)) setting the following case
6 schedule:

- 7 1. The date for Fact Discovery Cut-Off – April 30, 2025;
- 8 2. The date for Initial Expert Disclosure – April 14, 2025;
- 9 3. The date for Rebuttal Expert Disclosure – May 23, 2025;
- 10 4. The date for Expert Discovery Cut-Off – May 30, 2025;
- 11 5. Last Date to Hear Motions – August 6, 2025;
- 12 6. Last Date to Hear *Daubert* Motions – September 3, 2025;
- 13 7. Deadline to Complete Settlement Conference – September 24, 2025;
- 14 8. Deadline for First Round of Trial Filings – October 1, 2025;
- 15 9. Deadline for Second Round of Trial Filings – October 15, 2025;
- 16 10. The date for Final Pretrial Conference – October 29, 2025;
- 17 11. The date for Trial – November 17, 2025;

18 WHEREAS, Plaintiffs and Defendants Los Angeles County Sheriff’s
19 Department and Sheriff Luna (the “LA Defendants”) have been actively engaged in
20 discovery since November 2024. On November 4, 2024, LA Defendants served
21 their first set of Requests for Productions on Plaintiffs seeking documents related to
22 Plaintiffs’ CCW permit applications and past criminal and firearm ownership
23 history, as well as documents related to the organizational Plaintiffs’ organizational
24 charts and memberships and documents supporting Plaintiffs’ claims. Plaintiffs
25 responded to LA Defendants’ document requests on December 4, 2024 and to date
26 have made two responsive document productions. Plaintiffs also served their first
27 set of Requests for Productions on LA Defendants in June 2024, prior to the parties’
28

1 Rule 26(f) conference, and second set of Requests for Productions, first set of
2 Interrogatories, and first set of Requests for Admissions on LA Defendants at the
3 end of February 2025, concerning among other things LASD's CCW permit
4 application approval process, staffing, and statistics related to past permit issuances
5 and denials. LA Defendants responded to Plaintiffs' June 2024 document requests
6 in December 2024 and are currently engaging in diligent preparation of responses to
7 Plaintiffs' February 2025 discovery requests. Also since November 2024, LA
8 Defendants and Plaintiffs have negotiated and ultimately agreed upon extensive
9 stipulated facts, in an effort to narrow discovery and areas of dispute for the Court;

10 WHEREAS, in parallel to active discovery and negotiation of stipulated facts,
11 the LA Defendants and Plaintiffs have been engaging in good-faith settlement
12 negotiations since at least January 2025 that, if reached, would resolve a significant
13 portion of Plaintiffs' claims against the LA Defendants;

14 WHEREAS, a settlement of a substantial portion of Plaintiffs' claims against
15 the LA Defendants would obviate the need for a significant portion of the
16 outstanding discovery, of future motion practice, and of trial against the LA
17 Defendants;

18 WHEREAS, a modest extension of the case schedule would permit Plaintiffs
19 and the LA Defendants to efficiently devote resources to settlement negotiations and
20 parameters while continuing to proceed diligently with discovery, but without the
21 short-term demands of discovery inhibiting efforts to reach a mutually agreeable
22 resolution of at least a substantial portion of this action as to the LA Defendants;

23 WHEREAS, Plaintiffs and Defendant California Attorney General Rob Bonta
24 (the "Attorney General") have actively engaged in the discovery process since
25 November 2024 and remain in negotiations with respect to a statement of relevant
26 stipulated facts;

1 WHEREAS, Plaintiffs and the Attorney General continue to discuss the scope
2 and trajectory of the litigation;

3 WHEREAS, the Attorney General does not oppose an extension of all case
4 deadlines to facilitate further discussions among all parties to this litigation;

5 WHEREAS, Plaintiffs have also separately reached a tentative settlement
6 agreement with Defendants La Verne Police Department and Chief of Police Samuel
7 Gonzalez (the “La Verne Defendants”) which will, once finalized, completely
8 resolve the claims against the La Verne Defendants, obviating the need for further
9 discovery, motion practice, and trial on those claims;

10 WHEREAS, good cause therefore exists for all deadlines in the Order to be
11 extended for approximately 60 days, including the deadlines for discovery, expert
12 discovery, and trial, and corresponding deadlines;

13 WHEREAS, the parties have not made any previous requests to extend the
14 deadlines in the Order;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the
16 parties through their undersigned counsel of record, and subject to the approval of
17 the Court, that:

- 18 1. The date for Fact Discovery Cut-Off be extended to June 30, 2025;
- 19 2. The date for Initial Expert Disclosure be extended to June 13, 2025;
- 20 3. The date for Rebuttal Expert Disclosure be extended to July 22, 2025;
- 21 4. The date for Expert Discovery Cut-Off be extended to July 29, 2025;
- 22 5. Last Date to Hear Motions be extended to October 8, 2025;
- 23 6. Last Date to Hear *Daubert* Motions be extended to November 5, 2025;
- 24 7. Deadline to Complete Settlement Conference to extended to November 24,
25 2025;
- 26 8. Deadline for First Round of Trial Filings be extended to December 1, 2025;
- 27
- 28

9. Deadline for Second Round of Trial Filings be extended to December 15, 2025;

10. The date for Final Pretrial Conference be extended to January 7, 2026;

11. The date for Trial be extended to January 26, 2026.

IT IS HEREBY STIPULATED AND AGREED.

Dated: March 13, 2025

Respectfully submitted,

/s/ Ryan Chabot

RYAN CHABOT

WILMER CUTLER PICKERING

HALE AND DORR LLP

Attorney for Defendants Los Angeles County

Sheriff's Department and Sheriff Robert Luna

Dated: March 13, 2025

/s/ Konstadinos Moros

KONSTADINOS MOROS

MICHEL & ASSOCIATES, P.C.

Attorney for Plaintiffs

Dated: March 13, 2025

/s/ Kimberly Hall Barlow

KIMBERLY HALL BARLOW

JONES MAYER

Attorney for Defendants La Verne Police

Department and La Verne Chief of Police

Colleen Flores

Dated: March 13, 2025

/s/ Nicholas Reiss Green

NICHOLAS REISS GREEN

Deputy Attorney General

CALIFORNIA DEPARTMENT OF JUSTICE

Attorney for Defendant Attorney General of

California Rob Bonta

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to the United States District Court for the Central District of California's Civil L.R. 5-4.3.4(a)(2)(i), Ryan Chabot attests that concurrence in the filing of this document has been obtained from Konstadinos Moros, counsel for Plaintiffs, Kimberly Hall Barlow, counsel for Defendants La Verne Police Department and La Verne Chief of Police Colleen Flores, and Nicholas Reiss Green, counsel for Defendant Attorney General of California Rob Bonta.

Dated: March 13, 2025

BY: /s/ Ryan Chabot
RYAN CHABOT
WILMER CUTLER PICKERING
HALE AND DORR LLP

*Attorney for Defendants Los Angeles County
Sheriff's Department and Sheriff Robert Luna*