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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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13 **IN RE: SENATE BILL 2 LITIGATION**

Case No. 8:23-cv-01798-MRA-ADS

**DECLARATION OF ROBERT  
MEYERHOFF IN SUPPORT OF  
STAY OR, IN THE  
ALTERNATIVE, A STIPULATION  
MODIFYING CIVIL TRIAL  
ORDER [DKT. 74] AND  
CONTINUE DEADLINES AND  
HEARING DATE**

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19 Courtroom: 9B  
Judge: Hon. Monica Ramirez  
Almadani  
20 Trial Date: None.  
21 Action Filed: September 26, 2023  
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1 I, Robert Meyerhoff, declare as follows:

2 1. I am a deputy attorney general with the California Department of  
3 Justice and serve as lead counsel to Defendant Rob Bonta, in his official capacity as  
4 Attorney General of the State of California, in these matters.

5 2. Due to the fact that the Supreme Court's resolution of the recently-  
6 granted petition for a writ of certiorari in *Wolford, et al. v. Lopez*, Case No. No. 24-  
7 1046 (*Wolford*) may provide guidance to this Court on the constitutionality of the  
8 provisions of Senate Bill 2 challenged in these cases, the *May* Plaintiffs, the  
9 *Carralero* Plaintiffs, and Defendant have agreed, with the Court's permission, to  
10 stay of these cases pending the issuance of the Supreme Court's decision on the  
11 petition in *Wolford*.

12 3. In the alternative, if the Court does not stay these matters pending a  
13 decision in *Wolford*, due to the complexity and breadth of the issues presented in  
14 this matter, as well as the number of experts providing expert reports in support of  
15 the parties' positions, counsel for the *May* Plaintiffs, the *Carralero* Plaintiffs, and  
16 Defendant have agreed to jointly stipulate, subject to the Court's approval, to  
17 modify certain dates in the Court's Civil Trial Order [Dkt. 74], set a briefing  
18 schedule for Plaintiffs' forthcoming motions for summary judgment, and file  
19 responsive briefs with enlarged word limits.

20 4. Defendant propounded written discovery on the *Carralero* Plaintiffs  
21 and the *May* Plaintiffs on June 10, 2025.

22 5. Pursuant to extensions agreed to by the parties, the *Carralero* Plaintiffs  
23 timely responded to all of Defendant's written discovery by August 5, 2025.

24 6. Pursuant to extensions agreed to by the parties, the *May* Plaintiffs  
25 timely responded to all of Defendant's written discovery by July 31, 2025.

26 7. The *May* Plaintiffs propounded written discovery on Defendant on  
27 July 22, 2025.

28 8. Pursuant to extensions agreed to by the parties, Defendant timely

1 responded to all of the *May* Plaintiffs’ written discovery by August 28, 2025.

2 9. Depositions of the individual Plaintiffs in both the *May* and *Carralero*  
3 cases were conducted between July 28, 2025, and August 29, 2025.

4 10. Defendant served initial expert disclosures on Plaintiffs on August 25,  
5 2025, per the deadline set in the Court’s June 13, 2025 Civil Trial Order [Dkt. 74].

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7 I declare under penalty of perjury under the laws of the United States of  
8 America that the foregoing is true and correct. Executed on October 9, 2025.

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/s/ Robert L. Meyerhoff  
Robert L. Meyerhoff

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