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

11
12 **IN RE: SENATE BILL 2 LITIGATION**

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

**STIPULATED REQUEST FOR A
STAY OR, IN THE
ALTERNATIVE, FIRST
STIPULATION TO CONTINUE
PRETRIAL AND TRIAL DATES,
SET BRIEFING SCHEDULE FOR
MOTIONS FOR SUMMARY
JUDGMENT, AND INCREASE
WORD LIMITS**

Courtroom: 9B
Judge: Hon. Monica Ramirez
Almadani
Trial Date: None.
Action Filed: September 26, 2023

STIPULATION

1
2 Plaintiffs Marco Antonio Carralero, Garrison Ham, Michael Schwartz, Orange
3 County Gun Owners PAC, San Diego County Gun Owners PAC, California Gun
4 Rights Foundation, and the Firearms Policy Coalition (the *Carralero* Plaintiffs),
5 Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary Brennan, Tony Barretto,
6 Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Jose Flores, Andrew Harms,
7 Dr. Sheldon Hough, DDS, The Second Amendment Foundation, Gun Owners of
8 America, Gun Owners Foundation, Gun Owners of California, Inc., the Liberal Gun
9 Club, Inc., and the California Rifle & Pistol Association, Incorporated (the *May*
10 Plaintiffs), and Defendant Rob Bonta in his official capacity as Attorney General of
11 California (Defendant, and collectively with the *Carralero* and *May* Plaintiffs, the
12 Parties), hereby stipulate and agree as follows:

13 **WHEREAS**, the *Carralero* Plaintiffs, the *May* Plaintiffs, and Defendant
14 believe that the Supreme Court’s resolution of the recently-granted petition for a
15 writ of certiorari in *Wolford, et al. v. Lopez*, Case No. No. 24-1046 (*Wolford*) may
16 provide guidance to this Court on the constitutionality of the provisions of Senate
17 Bill 2 challenged in these cases;

18 **WHEREAS**, the *Carralero* Plaintiffs, the *May* Plaintiffs, and Defendant agree
19 that the Parties will not be prejudiced by a stay pending the issuance of the Supreme
20 Court’s decision in *Wolford*;

21 **WHEREAS**, the Parties do not intend for a stay to foreclose any Party from
22 seeking an order from the Court to reopen discovery if that Party can satisfy the
23 good cause standard for doing so based upon the Supreme Court’s analysis (if any)
24 in *Wolford*;

25 **IT IS HEREBY STIPULATED**, by and between the Parties, through their
26 undersigned counsel, subject to the Court’s approval, as follows:

27 1. These cases are hereby stayed pending the Supreme Court’s resolution
28 of the recently-granted petition for a writ of certiorari in *Wolford*; and

1 2. The parties shall file a joint status report no later than fourteen days
2 after the issuance of the Supreme Court’s opinion in *Wolford*.

3 In the alternative, **WHEREAS**, the *Carralero* Plaintiffs, the *May* Plaintiffs,
4 and Defendant intend to file motions for summary judgment which they believe
5 could resolve this case in its entirety;

6 **WHEREAS**, the deadline for non-discovery motions to be heard is December
7 22, 2025;

8 **WHEREAS**, good cause exists to enter a stipulated briefing schedule because
9 given the number of provisions of Senate Bill 2 challenged by Plaintiffs and the
10 number of experts that Defendant has identified, the Parties would benefit from
11 additional time to prepare their dispositive motions, and the resulting more
12 streamlined presentation of argument would conserve judicial resources;

13 **WHEREAS**, good cause exists to enlarge the word count of the briefs,
14 allowing a more streamlined and fulsome presentation of the issues of the case;

15 **WHEREAS**, the Parties have met and conferred and agreed, subject to the
16 Court’s approval, to the following briefing schedule:

- 17 • January 12, 2025 – Deadline for the *May* Plaintiffs and *Carralero*
18 Plaintiffs to file their motions for summary judgment;
- 19 • February 12, 2025 – Deadline for Defendant to file his combined cross-
20 motion for summary judgment and opposition to the *May* and *Carralero*
21 Plaintiffs’ motions for summary judgment;
- 22 • March 2, 2025 – Deadline for the *May* and *Carralero* Plaintiffs to each
23 file their respective combined opposition to Defendant’s cross-motion
24 for summary judgment and reply in support of their own motions for
25 summary judgment;
- 26 • March 23, 2025 – Deadline for Defendant to file his reply in support of
27 his cross-motion for summary judgment;
- 28

- 1 • April 13, 2025 (or as soon thereafter as the Court has availability) –
2 Hearing on Plaintiffs’ motions for summary judgment and Defendant’s
3 cross-motion for summary judgment.

4 **WHEREAS**, the Parties have met and conferred and agreed, subject to the
5 Court’s approval, to the following additional word count for their briefs:

- 6 • The *May* Plaintiffs and the *Carralero* Plaintiffs shall each have a 7,000-
7 word limit for their briefs in support of their motions for summary
8 judgment and shall be due on January 12, 2025;
9 • Defendant’s combined brief in opposition to the *May* Plaintiffs’ and
10 *Carralero* Plaintiffs’ motions for summary judgment and in support of
11 his cross-motion for summary judgment shall have a 12,500-word limit;
12 • The *May* Plaintiffs’ and the *Carralero* Plaintiffs’ respective combined
13 briefs opposing Defendant’s motion for summary judgment and
14 replying in support of their motions for summary judgment shall each
15 have an 8,000-word limit;
16 • Defendant’s reply in support of his cross-motion for summary judgment
17 shall have a 10,000-word limit.

18 **WHEREAS**, given the requested streamlined briefing schedule, the Parties
19 believe that it would promote judicial efficiency and conserve the resources of the
20 Parties to continue other pre-trial dates until after the hearing on the cross-motions
21 for summary judgment;

22 **IT IS HEREBY STIPULATED**, by and between the Parties, through their
23 undersigned counsel, subject to the Court’s approval, as follows:

- 24 1. Plaintiffs shall file their motions for summary judgment (of no longer than
25 7,000 words each) and supporting documents by January 12, 2026;
26 2. Defendant shall file his combined opposition and cross-motion for
27 summary judgment (of no longer than 12,500 words) by February 9,
28 2026;

- 1 3. Plaintiffs shall each file their combined opposition and reply (of no longer
- 2 than 8,000 words each) by March 2, 2026;
- 3 4. Defendant shall file his reply (of no longer than 10,000 words) by March
- 4 23, 2026;
- 5 5. The matter will be heard by this Court on April 13, 2026, or as soon
- 6 thereafter as it has availability;
- 7 6. The last day to hear Daubert motions shall be continued to June 8, 2026;
- 8 7. The settlement conference completion date shall be continued to June 29,
- 9 2026;
- 10 8. The filing deadline for motions in limine shall be continued to July 7,
- 11 2026;
- 12 9. The filing deadline for oppositions to motions in limine shall be continued
- 13 to July 10, 2026;
- 14 10. The final pretrial conference shall be held by this Court on August 3,
- 15 2026, or as soon thereafter as it has availability.

16 Dated: October 9, 2025

Respectfully submitted,

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18 ROB BONTA
Attorney General of California
19 MARK BECKINGTON
Supervising Deputy Attorney General

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21 /s/ Robert L. Meyerhoff
22 ROBERT L. MEYERHOFF
Attorneys for Defendant Rob Bonta in
23 his official capacity as Attorney
24 General of the State of California
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1 Dated: October 9, 2025

Respectfully submitted,

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/s/ Anna M. Barvir
ANNA M. BARVIR
Michelle & Associates, P.C.
Attorneys for Plaintiffs

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Dated: October 9, 2025

Respectfully submitted,

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/s/ Stephen Duvernay
STEPHEN DUVERNAY
Benbrook Law Group, PC
Attorneys for Plaintiffs

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Dated: October 9, 2025

Respectfully submitted,

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/s/ Donald Kilmer
DONALD KILMER, ATTORNEY AT LAW
Attorney for Plaintiffs

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