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12 **DISTRICT COURT OF THE UNITED STATES**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 B&L PRODUCTIONS, INC., d/b/a
15 CROSSROADS OF THE WEST; GERALD
16 CLARK; ERIC JOHNSON; CHAD
17 LITRELL; JAN STEVEN MERSON;
18 CALIFORNIA RIFLE & PISTOL
19 ASSOCIATION, INCORPORATED;
20 ASIAN PACIFIC AMERICAN GUN
21 OWNERS ASSOCIATION; SECOND
22 AMENDMENT LAW CENTER, INC.; and
23 SECOND AMENDMENT FOUNDATION,

20 Plaintiffs,

21 v.

22 GAVIN NEWSOM, in his official capacity
23 as Governor of the State of California; ROB
24 BONTA, in his official capacity as Attorney
25 General of the State of California; KAREN
26 ROSS, in her official capacity as Secretary
27 of California Department of Food &
28 Agriculture and in his personal capacity;
TODD SPITZER, in his official capacity as
District Attorney of Orange County; 32nd
DISTRICT AGRICULTURAL
ASSOCIATION; DOES 1-10,

Defendants.

Case No.: 8:22-cv-01518-JWH

JOINT STATUS REPORT

Conf. Date: December 5, 2025
Conf. Time: 11:00 AM
Courtroom: 9D
Judge: Hon. John W. Holcomb

Action Filed: August 12, 2022

1 Plaintiffs B&L Productions, Inc., d/b/a Crossroads of the West, Gerald Clark, Eric
2 Johnson, Chad Littrell, Jan Steven Merson, California Rifle & Pistol Association,
3 Incorporated, Second Amendment Law Center, Inc., Asian Pacific American Gun Owners
4 Association, and Second Amendment Foundation, Inc., (“Plaintiffs”) and Defendants
5 Gavin Newsom, Rob Bonta, Karen Ross, and the 32nd District Agricultural Association
6 (“State Defendants”), through their counsel of record, hereby submit this Joint Status
7 Report before the Scheduling Conference set for December 5, 2025.

8 Since the Court’s last order, the Parties have continued to meet and confer in good
9 faith regarding (1) the potential resolution of this matter without the need for further
10 litigation, and (2) the process for Plaintiffs to file a Second Amended Complaint, in case
11 negotiations stall. On November 10, 2025, Plaintiffs presented the State Defendants with a
12 proposal that, if accepted, would resolve Plaintiffs’ claims. State Defendants’ counsel is
13 reviewing the proposal in light of the Ninth Circuit’s decision in this case and will discuss
14 the proposal with their clients.

15 If the State Defendants were to accept Plaintiffs’ proposal—or the Parties were to
16 reach agreement on similar terms—the Parties anticipate that this matter could be resolved
17 without further court intervention. But if the proposal were to be rejected or the Parties
18 could not reach a resolution, then Plaintiffs believe it will be necessary to amend their
19 complaint in light of the Ninth Circuit panel decision and the State Defendants’ rejection
20 of their proposal. They will also seek to add new allegations about the application of the
21 Challenged Statutes (Penal Code sections 27573 and 27575) to raffles and auctions on
22 state properties, an issue that arose after the Ninth Circuit issued its decision. The State
23 Defendants are reviewing Plaintiffs’ draft Second Amended Complaint, which was
24 provided to the State Defendants on November 17, 2025, to determine whether they can
25 stipulate to leave to amend.

26 If the State Defendants were to reject Plaintiffs’ proposal *and* the Parties cannot
27 agree that Plaintiffs should be granted leave to amend, then Plaintiffs intend to promptly
28 file a motion for leave to amend their claims. And, if the Court denies Plaintiffs’

1 anticipated motion for leave to amend, then the State Defendants intend to file a brief
2 motion for judgment on the pleadings regarding the currently operative First Amended
3 Complaint (ECF No. 19). The Parties also agree to confer on submitting a revised version
4 of the Joint Rule 26(f) Report filed on December 28, 2023 (ECF No. 56).

5 The Parties appreciate the Court's continued patience. They are actively discussing
6 whether it is possible to resolve the remaining issues. The Parties accordingly believe that
7 good cause exists to continue the scheduling conference to at least January 5, 2026.
8 Alternatively, the Parties can further update the Court at the scheduling conference that is
9 currently set for December 5, 2025.

10 Dated: November 21, 2025

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

11 _____
12 Anna M. Barvir
13 Counsel for Plaintiffs B&L Productions, Inc.,
14 California Rifle & Pistol Association,
15 Incorporated, Gerald Clark, Eric Johnson, Chad
16 Littrell, Jan Steven Merson, Asian Pacific
17 American Gun Owner Association, Second
18 Amendment Law Center, Inc.

16 Dated: November 21, 2025

LAW OFFICES OF DONALD KILMER, APC

s/ Donald Kilmer

17 _____
18 Donald Kilmer
19 Counsel for Plaintiff Second Amendment
20 Foundation

19 Dated: November 21, 2025

ROB BONTA
Attorney General of California

s/ Charles J. Sarosy

21 _____
22 CHARLES J. SAROSY
23 Deputy Attorney General
24 Attorneys for Defendants Gavin Newsom, Rob
25 Bonta, Karen Ross, and the 32nd District
26 Agricultural Association
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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 JOINT STATUS REPORT. 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: November 21, 2025

s/ Anna M. Barvir
Anna M. Barvir

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *B&L Productions, et al. v. Gavin Newsom, et al.*
Case No.: 8:22-cv-01518-JWH

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:

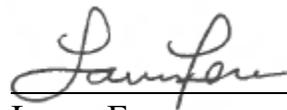
JOINT STATUS REPORT

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

Nicole J. Kau, Deputy Attorney General
nicole.kau@doj.ca.gov
Charles J. Sarosy, Deputy Attorney General
charles.sarosy@doj.ca.gov
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
Attorneys for State Defendants

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

Executed November 21, 2025.



Laura Fera