

1 C.D. Michel – SBN 144258
2 Anna M. Barvir – SBN 268728
3 Tiffany D. Chevront – SBN 317144
4 MICHEL & ASSOCIATES, P.C.
5 180 East Ocean Blvd., Suite 200
6 Long Beach, CA 90802
7 Telephone: (562) 216-4444
8 Email: cmichel@michellawyers.com

6 Attorneys for Plaintiffs B&L Productions, Inc., California Rifle & Pistol Association,
7 Incorporated, Gerald Clark, Eric Johnson, Chad Littrell, Jan Steven Merson, Asian
8 Pacific American Gun Owner Association, Second Amendment Law Center, Inc.

9 Donald Kilmer – SBN 179986
10 Law Offices of Donald Kilmer, APC
11 14085 Silver Ridge Road
12 Caldwell, Idaho 83607
13 Telephone: (408) 264-8489
14 Email: Don@DKLawOffice.com

15 Attorney for Plaintiff Second Amendment Foundation

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 B&L PRODUCTIONS, INC., et al.,
19 Plaintiffs,
20 v.
21 GAVIN NEWSOM, et al.,
22 Defendants.

Case No.: 8:22-cv-01518 JWH (JDEx)

**NOTICE OF PLAINTIFFS’ MOTION
AND MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Hearing Date: February 27, 2026
Hearing Time: 9:00 AM
Courtroom: 9D
Judge: Hon. John W. Holcomb

Action Filed: August 12, 2022

1 TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Notice is hereby give that on February 27, 2026 at 9:00 AM in Courtroom 9D
3 of the United States Court for the Central District, located at 411 West 4th Street,
4 Santa Ana, California 92701, Plaintiffs B & L Productions, Inc., d/b/a Crossroads of
5 the West, Gerald Clark, Eric Johnson, Chad Littrell, Jan Steven Merson, California
6 Rifle & Pistol Association, Incorporated, Second Amendment Law Center, Inc.,
7 Asian Pacific American Gun Owners Association, and Second Amendment
8 Foundation, Inc., will move for an order granting leave to file a Second Amended
9 Complaint.

10 Plaintiffs bring this motion because they have already amended their pleading
11 once as a matter of right and Defendants declined to stipulate for leave to amend
12 under FRCP 15. Plaintiffs have good cause to file the proposed SAC; their proposed
13 amendment is not brought in bad faith or for any dilatory purpose, Defendants will
14 not be unduly prejudiced, and the proposed amendment is not futile.

15 This application is made on the grounds set forth in the accompanying
16 memorandum of points and authorities, the signed declaration of Anna M. Barvir in
17 support, and the proposed SAC filed simultaneously herewith, all pleadings and
18 papers filed in this action, any argument of counsel, and further evidence as the
19 Court may consider at or before the hearing on this motion.

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21 Dated: January 16, 2026

MICHEL & ASSOCIATES, P.C.

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/s/ Anna M. Barvir

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Anna M. Barvir

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Counsel for Plaintiffs B&L Productions, Inc.,
California Rifle & Pistol Association,
Incorporated, Gerald Clark, Eric Johnson, Chad
25 Littrell, Jan Steven Merson, Asian Pacific
26 American Gun Owner Association, Second
Amendment Law Center, Inc.

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1 Dated: January 16, 2026

LAW OFFICES OF DONALD KILMER, APC

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/s/ Donald Kilmer

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Donald Kilmer

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Counsel for Plaintiff Second Amendment
Foundation

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ATTESTATION OF E-FILED SIGNATURES

7

I, Anna M. Barvir, am the ECF User whose ID and password are being used
8 to file this NOTICE OF PLAINTIFFS' MOTION AND MOTION FOR LEAVE TO
9 FILE SECOND AMENDED COMPLAINT. In compliance with Central District of
10 California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and
11 have concurred in this filing.

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Dated: January 16, 2026

/s/ Anna M. Barvir

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Anna M. Barvir

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

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

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:

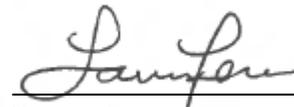
NOTICE OF PLAINTIFFS' MOTION AND MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

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
charles.sarosy@doj.ca.gov
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
Attorney for Defendants

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed January 16, 2026.



Laura Fera