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California

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11

12 **JUNIOR SPORTS MAGAZINES**
13 **INC. et al.,**

14 Plaintiffs,

15 v.

16 **ROB BONTA, in his official capacity**
17 **as Attorney General of the State of**
18 **California et al.,**

19 Defendants.
20

2:22-cv-04663-CAS-JC

**STIPULATION FOR ENTRY OF
ORDER, FINAL JUDGMENT, AND
PERMANENT INJUNCTION**

Judge: Hon. Christina A. Snyder
Trial Date: None set
Action Filed: July 8, 2022

21 Plaintiffs Junior Sports Magazines Inc., Raymond Brown, California Youth
22 Shooting Sports Association, Inc., Redlands California Youth Clay Shooting
23 Sports, Inc., California Rifle & Pistol Association, Incorporated, The CRPA
24 Foundation, Gun Owners of California, Inc., and Second Amendment Foundation
25 (collectively, "Plaintiffs") and Defendant Rob Bonta, in his official capacity as
26 Attorney General of the State of California, ("Defendant" and, together with
27 Plaintiffs, the "Parties") agree and stipulate as follows:
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1 1. Plaintiffs and Defendant hereby consent and ask the Court to enter in this
2 matter the Order, Final Judgment and Permanent Injunction attached to this
3 Stipulation as “Exhibit 1.” The Parties have agreed and stipulated to settle this
4 action under the specific terms set forth in that document.

5 2. This Court has jurisdiction over the subject matter of this lawsuit and the
6 Parties. Venue is proper in this Court.

7 3. Entry of the Order, Final Judgment, and Permanent Injunction will
8 constitute the final judgment in this matter.

9
10 Dated: March 17, 2026

Respectfully submitted,

11 ROB BONTA
12 Attorney General of California
13 ANTHONY R. HAKL
Supervising Deputy Attorney General

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15 /s/ Gabrielle D. Boutin
16 GABRIELLE D. BOUTIN
17 Deputy Attorney General
18 *Attorneys for Defendant Rob Bonta,*
19 *in his official capacity as Attorney*
20 *General of the State of California*
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1 Dated: March 17, 2026

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Plaintiffs Junior Sports
Magazines, Inc., Raymond Brown,
California Youth Shooting Sports
Association, Inc., Redlands California
Youth Clay Shooting Sports, Inc.,
California Rifle & Pistol Association,
Incorporated, The CRPA Foundation,
and Gun Owners of California, Inc.

10 Dated: March 17, 2026

**LAW OFFICES OF DONALD KILMER,
APC**

s/ Donald Kilmer

Donald Kilmer

Attorneys for Plaintiff Second
Amendment Foundation

FILER'S ATTESTATION (L. R. 5-4.3.4(a)(2))

18 I, Gabrielle D. Boutin, hereby attest in accordance with Local Rule 5-
19 4.3.4(a)(2) that all other signatories listed, and on whose behalf this filing is
20 submitted, concur in the filing's content and have authorized the filing.

21 Dated: March 17, 2026

/s/ Gabrielle D. Boutin

Gabrielle D. Boutin

EXHIBIT 1

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

**JUNIOR SPORTS MAGAZINES
INC. et al.,**

Plaintiffs,

v.

**ROB BONTA, in his official capacity
as Attorney General of the State of
California et al.,**

Defendants.

2:22-cv-04663-CAS-JC

**[PROPOSED] ORDER, FINAL
JUDGMENT, AND PERMANENT
INJUNCTION**

Judge: Hon. Christina A. Snyder
Trial Date: None set
Action Filed: July 8, 2022

The Court having considered the parties' Stipulation for Entry of Order, Final Judgment, and Permanent Injunction ("Stipulation") and finding good cause,

IT IS HEREBY ORDERED as follows:

I. DEFINITIONS

For purposes of this Order, the following definitions apply:

1. "Section 22949.80" means section 22949.80 of the California Business and Professions Code.

2. "Plaintiffs" means Plaintiffs Junior Sports Magazines Inc., Raymond Brown, California Youth Shooting Sports Association, Inc., Redlands California Youth Clay Shooting Sports, Inc., California Rifle & Pistol Association, Incorporated, The CRPA Foundation, Gun Owners of California, Inc., and Second Amendment Foundation, and each of their successors and assigns.

3. "Defendant" means Defendant Rob Bonta, in his official capacity as Attorney General of the State of California, his successors in office, and each of their agents acting within the scope of their official duties.

4. “Complaint” means the Complaint for Declaratory & Injunctive Relief filed in this action on July 8, 2022, ECF No. 1.

II. JUDGMENT

Judgment is hereby entered in favor of Plaintiffs and against Defendant on the Second Cause of Action in the Complaint, “Violation of Right to Commercial Speech Under U.S. Const., amend. I.” ECF No. 1 at 32. The Court dismisses the remaining claims with prejudice.

III. JUDICIAL DECLARATION

IT IS HEREBY DECLARED that Section 22949.80, in its entirety, violates the First Amendment of the United States Constitution on its face and as applied to Plaintiffs.

IV. PERMANENT INJUNCTION

IT IS HEREBY ORDERED that Defendant shall be permanently enjoined from enforcing section 22949.80. The Attorney General is further directed to issue an alert through an information bulletin or other ordinary communications notifying all District Attorneys, County Counsels, and City Attorneys in California that enforcement of Section 22949.80 has been permanently enjoined in its entirety.

V. OTHER ORDERS

IT IS ORDERED that this Court shall retain jurisdiction of this matter for the purpose of enforcing this Order, Final Judgment, and Permanent Injunction.

IT IS ORDERED that Plaintiffs shall recover from Defendant the amount of \$900,000 in full compensation for the attorneys' fees and costs incurred by Plaintiffs in connection with this action and the related appeals. This award is subject to the following terms, to which the Parties have agreed and stipulated:

1. Payment shall be made as follows:

A. The amount of \$550,000 shall be paid the law firm of Michel & Associates, P.C., for representation of Junior Sports Magazines Inc., Raymond Brown, California Youth Shooting Sports Association, Inc.,

1 Redlands California Youth Clay Shooting Sports, Inc., California Rifle
2 & Pistol Association, Incorporated, The CRPA Foundation, and Gun
3 Owners of California, Inc.

4 B. The amount of \$350,000 shall be paid to the Law Offices of
5 Donald Kilmer, A Professional Corporation, for representation of the
6 Second Amendment Foundation.

7 2. Post-judgment interest on the attorneys' fees and costs is stayed and
8 abated if paid within 270 days of this Judgment. Post-judgment interest shall then
9 begin to accrue on day 271 at a rate of three-and-a-half percent (3.5%), shall be
10 computed daily to the date of payment, and shall be compounded annually.

11 3. The date of payment is contingent upon certification of availability of
12 funds, the approval of the Director of the Department of Finance and is subject to
13 appropriation by the Legislature.

14 4. Defendant shall keep Plaintiffs apprised of the progress of any bill (if
15 necessary), and to act in good faith to facilitate its enactment as soon as practicable.

16 5. If Defendant fails to pay the agreed upon amount on or before 270 days
17 from the date of judgment, Plaintiffs retain the right to seek additional attorneys'
18 fees, costs, and interest by noticed motion seeking more than the agreed-upon
19 amount, and the Court retains jurisdiction to decide such a motion.

20 6. In the event Plaintiffs are required to seek enforcement of this part of the
21 judgment, Defendant will not oppose the request for the amounts set out above, and
22 Plaintiffs will not need to submit an affidavit or other evidence to the Court in
23 support of this original award for fees and costs, as would otherwise be required.

24 **IT IS ORDERED** that all other relief sought in Complaint is denied.

25 FINAL JUDGMENT IS ENTERED pursuant to the terms of this Order.
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IT IS SO ORDERED.

Dated: _____

Hon. Christina A. Snyder
United States District Judge

CERTIFICATE OF SERVICE

Case Name: **Junior Sports Magazines Inc.,** No. **2:22-cv-04663-CAS-JC**
et al. v. Rob Bonta, et al.

I hereby certify that on March 17, 2026, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION FOR ENTRY OF ORDER, FINAL JUDGMENT, AND
PERMANENT INJUNCTION**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 17, 2026, at Los Angeles, California.

Cecilia Apodaca
Declarant

/s/ Cecilia Apodaca
Signature

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