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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION
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15 **IN RE: SENATE BILL 2 LITIGATION**
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8:23-cv-01696-MRA-ADS

**DECLARATION OF KRISTI
HUGHES IN SUPPORT OF JOINT
STIPULATION TO EXTEND
DEADLINE TO FILE PROPOSED
SCHEDULE OF PRETRIAL
DATES WORKSHEET**

Courtroom: 9b
Judge: The Honorable Mónica
Rámirez Almadani
Trial Date: None
Action Filed: September 12, 2023
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1 I, Kristi Hughes, declare as follows:

- 2 1. I am a deputy attorney general with the California Department of
3 Justice and serve as counsel to Defendant Rob Bonta, in his official
4 capacity as Attorney General of the State of California, in these
5 matters.
- 6 2. After the Court lifted the stay and reopened this case, the Parties
7 met and conferred via videoconference on July 21, 2026, in an
8 attempt to comply with the Court's July 15, 2026 order for the
9 parties to complete the Court's Proposed Schedule of Pretrial Dates
10 Worksheet.
- 11 3. In discussing proposed dates, all counsel agreed that more time was
12 necessary before they could propose pretrial dates. Defense counsel
13 expressed a need to confer with previously retained experts to
14 determine whether the expert declarations, filed November and
15 December 2023, should be updated. Plaintiffs' counsel generally
16 expressed a need to confer with clients, and counsel for the Second
17 Amendment Foundation (SAF) expressed a desire to assess whether
18 they wished to proceed with summary judgment briefing or whether
19 they wished to demand a jury trial, which counsel for SAF
20 characterizes as a "remote possibility" that "will only become a
21 necessary consideration if this case comes down to a contest about
22 the credibility of expert witnesses."
- 23 4. In order to allow the Parties sufficient time to confer and assess the
24 next steps in the litigation so that they may propose pretrial dates,
25 all counsel agreed, with this Court's permission, to extend the
26 deadline by one month to file the Proposed Schedule of Pretrial
27 Dates Worksheet.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct. Executed on July 22, 2026.

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4 /s/ Kristi A. Hughes
Kristi A. Hughes
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