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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ROBERT M. BLANK, an individual;
ANTONIO RAMOS RODRIGUEZ, an
individual; KYLE HOANG TRUONG, an
individual; CHARLES KOON CHIU
YOUNG, an individual; JONATHAN
YOUNG, an individual; CALIFORNIA RIFLE
& PISTOL ASSOCIATION,
INCORPORATED; and THE SECOND
AMENDMENT FOUNDATION,

Plaintiffs,

v.

SANTA CLARA COUNTY; SANTA CLARA
COUNTY SHERIFF'S DEPARTMENT;
SHERIFF ROBERT JONSEN, in his official
capacity; and DOES 1-10,

Defendants.

Case No.: 5:25-cv-08027-EJD

***ERRATA -- PLAINTIFFS' OPPOSITION
TO CALIFORNIA ATTORNEY
GENERAL'S MOTION TO INTERVENE
AS A MATTER OF RIGHT UNDER RULE
24(a), and CONSENT TO PERMISSIVE
INTERVENTION UNDER RULE 24(b)***

Hearing Date: September 17, 2026

Hearing Time: 9:00 a.m.

Courtroom: 4

Judge: The Hon. Edward J. Davila

Action Filed: September 22, 2025

Due to an oversight by counsel, the following paragraph was inadvertently omitted from ECF-Document 49 filed earlier today. The following text should have appeared on page 2 (ECF page 3) starting at line 15 with no other changes to Doc. 49:

28 U.S.C. § 2403 mandates that a District Court certify the question of intervention to a state Attorney General, but only if appropriate findings are made. That has not happened here. Neither the current Defendants, nor the proposed intervenor have asked this District Court to certify the question of intervention to the California Attorney General. Which is why 28 U.S.C. § 2403 cannot support a finding under Fed. R. Civ. P. 24(a)(1). The analysis is the same under Fed. R. Civ. P. 5.1, which is merely a notice requirement. The analysis is same under either § 2403 or Rule 5.1. Neither of these boot-strap theories support Intervention as of Right under Fed. R. Civ. P. 24, which is the mechanism for operationalizing the how and why of intervention (by right or permissive), and which is the focus of Plaintiffs' response to California's Motion to Intervene.

Respectfully Submitted,

Dated: July 24, 2026

MICHEL & ASSOCIATES, P.C.

/s/ Anna M. Barvir

Anna M. Barvir

Counsel for Plaintiffs Robert M. Blank, Antonio Ramos Rodriguez, Kyle Hoang Truong, Charles Koon Chiu Young, Jonathan Young, and California Rifle & Pistol Association, Incorporated

Dated: July 24, 2026

LAW OFFICES OF DONALD KILMER, APC

/s/ Donald Kilmer

Donald Kilmer

Counsel for Plaintiff The Second Amendment Foundation

ATTESTATION OF E-FILED SIGNATURES

I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this PLAINTIFFS' OPPOSITION TO CALIFORNIA ATTORNEY GENERAL'S MOTION TO INTERVENE. In compliance with Northern District of California L.R. 5-1(i)(3), I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: July 24, 2026

/s/ Donald Kilmer

Donald Kilmer

CERTIFICATE OF SERVICE

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case Name: *Blank v. Santa Clara County Sheriff's Department*
Case No.: 5:25-cv-08027-EJD

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 14085 Silver Ridge Road, Caldwell Idaho, 83607

I am not a party to the above-entitled action. I have caused service of:

Errata -- OPPOSITION TO CALIFORNIA ATTORNEY GENERAL'S MOTION TO INTERVENE AS A MATTER OF RIGHT UNDER RULE 24(a), and CONSENT TO PERMISSIVE INTERVENTION UNDER RULE 24(b)

on the following parties, as follows:

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

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

Executed on July 24, 2026, in Caldwell, Idaho.

/s/ Donald Kilmer
Donald Kilmer