

09/02/2026

By: _____ P. Vue Deputy

C.D. Michel – SBN 144258
Anna M. Barvir – SBN 268728
Tiffany D. Cheuvront – SBN 317144
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Facsimile: (562) 216-4445
Email: cmichel@michellawyers.com

David H. Thompson*
Peter A. Patterson*
Megan M. Wold*
Athanasia O. Livas*
Nicholas A. Varone*
COOPER & KIRK, PLLC
1523 New Hampshire Ave N.W.
Washington, D.C. 20036
Telephone: (202) 220-9600
Facsimile: (202) 220-9601
dthompson@cooperkirk.com
ppatterson@cooperkirk.com
mwold@cooperkirk.com
alivas@cooperkirk.com
nvarone@cooperkirk.com
**Admitted Pro Hac Vice*

Attorneys for Plaintiffs

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

POWAY WEAPONS & GEAR, INC. and
SGR VENTURES LLC (D/B/A
SACRAMENTO GUN RANGE),

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF TAX
AND FEE ADMINISTRATION; TRISTA
GONZALES, in her official capacity as
Director of the California Department of Tax
and Fee Administration,

Defendants.

Case No.: 25CV018964

**JOINT STIPULATION RE: BRIEFING
SCHEDULE AND HEARING DATE FOR
MOTIONS FOR SUMMARY JUDGMENT**

Dept: 16C
Judge: Hon. Christopher E. Krueger
Trial Date: Not Set
Complaint filed: August 11, 2025

1 Plaintiffs Poway Weapons & Gear, Inc. and SGR Ventures LLC (hereafter, “Plaintiffs”)
2 and Defendants California Department of Tax and Fee Administration and Trista Gonzalez, in her
3 official capacity as Director of the California Department of Tax and Fee Administration
4 (hereafter, “Defendants”), through their counsel of record, hereby stipulate and request that the
5 Court order as follows:

6 WHEREAS, Defendants filed a Demurrer to the Complaint on October 27, 2025;

7 WHEREAS, Plaintiffs filed a Motion for Summary Judgment on April 8, 2026, initially
8 set for hearing on August 25, 2026, and Defendants thereafter reserved September 8, 2026, for
9 their Motion for Summary Judgment;

10 WHEREAS, as the hearing on Defendants’ Demurrer was continued, the Parties stipulated
11 to continue Plaintiffs’ previously scheduled summary judgment hearing to September 8, 2026, so
12 that the Parties’ motions could be heard together;

13 WHEREAS, after two brief continuances, Defendants’ Demurrer came for hearing on
14 June 9, 2026;

15 WHEREAS, at the demurrer hearing, this Court sustained the demurrer in part, overruled
16 it in part, and granted Plaintiffs leave to amend the complaint;

17 WHEREAS, in light of the ruling granting leave to amend, the Court vacated the Parties’
18 previously scheduled Motions for Summary Judgment;

19 WHEREAS, the Plaintiffs filed their Amended Complaint on July 16, 2026, and the
20 Defendants filed their Answer on August 20, 2026;

21 WHEREAS, the Parties have met and conferred regarding a briefing and hearing schedule
22 for Plaintiffs’ renewed motion for summary judgment and any cross-motion for summary
23 judgment;

24 WHEREAS, the Parties seek to establish a coordinated briefing and hearing schedule that
25 will conserve judicial resources, allow Defendants a full opportunity to respond to the Amended
26 Complaint, and permit the Parties’ dispositive motions to be resolved together following
27 completion of the pleadings;

28 NOW, THEREFORE, the Parties stipulate and request that the Court order as follows:

1 1. Plaintiffs' Renewed Motion for Summary Judgment shall be filed on or before
2 December 7, 2026.

3 2. Defendants' Response to Plaintiffs' Renewed Motion for Summary Judgment and
4 Cross-Motion for Summary Judgment, if any, shall be filed on or before January 25, 2027.

5 3. Plaintiffs' Response to Defendants' Cross-Motion for Summary Judgment, if any,
6 and Reply in support of Plaintiffs' Renewed Motion for Summary Judgment shall be filed on or
7 before March 15, 2027.

8 4. Defendants' Reply in Support of Cross-Motion for Summary Judgment, if any,
9 shall be filed on or before April 5, 2027.

10 5. The hearing on Plaintiffs' Renewed Motion for Summary Judgment and any
11 Cross-Motion for Summary Judgment shall be held on May 4, 2027, or on the next available date
12 thereafter as determined by the Court.

13 IT IS SO STIPULATED.

14 Dated: September 2, 2026

MICHEL & ASSOCIATES, P.C

16 s/Anna M. Barvir

17 _____
Anna M. Barvir
Attorneys for Plaintiffs

18 Dated: September 2, 2026

19 ROB BONTA
Attorney General of California
20 ANNA FERRARI
Supervising Deputy Attorney General

21 s/Asha Albuquerque

22 _____
ASHA ALBUQUERQUE
Deputy Attorney General
23 Attorneys for Defendants

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

I, Haydee Villegas, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

On September 2, 2026, I served the foregoing document(s) described as:

JOINT STIPULATION RE: BRIEFING ON MOTIONS FOR SUMMARY JUDGMENT

on the interested parties in this action by placing

☐ the original

☒ a true and correct copy

thereof by the following means, addressed as follows:

Asha Albuquerque
Deputy Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102
Asha.Albuquerque@doj.ca.gov
*Attorneys for Defendants California
Department of Tax and Fee
Administration and Trista Gonzalez*

☐ (**BY MAIL**) As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit.

☒ (**BY ELECTRONIC MAIL**) As follows: I served a true and correct copy by electronic transmission. Said transmission was reported and completed without error.

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

Executed on September 2, 2026, at Long Beach, California.

Haydee Villegas

Haydee Villegas