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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

**PLAINTIFF'S NOTICE OF RELATED
CASE**

Action Filed: September 22, 2025

Pursuant to Local Rule 3-12, Plaintiffs Robert M. Blank, Antonio Ramos Rodriguez, Kyle Hoang Truong, Charles Koon Chiu Young, Jonathan Young, California Rifle & Pistol Association, Incorporated, and The Second Amendment Foundation note the following as a potentially related case: *United States of America v. City of San Jose, California, et al.*, Case No. 5:26-cv-10508-SVK, filed in the Northern District of California on September 16, 2026.

The cases are related because both challenge the constitutionality of fees imposed in connection with licensing for concealed carry permits in California and present overlapping questions concerning the Second Amendment's limits on such fees. Although the cases challenge fees imposed by different issuing authorities, both raise substantially similar questions concerning whether and to what extent carry-license fees are permissible under the Second Amendment, including the application of *New York State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. 1 (2022).

Respectfully submitted,

Dated: September 22, 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: September 22, 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 NOTICE OF RELATED CASE. 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: September 22, 2026

/s/ Anna M. Barvir

Anna M. Barvir

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 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 RELATED CASE

on the following parties, as follows:

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Attorney General Rob Bonta*

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 September 22, 2026, in Long Beach, California.

/s/ Haydee Villegas
Haydee Villegas