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and California Rifle & Pistol Association, Incorporated

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SOUTHERN DIVISION**

13 LANCE BOLAND, an individual;
14 MARIO SANTELLAN, an individual;
15 RENO MAY, an individual; JEROME
16 SCHAMMEL, an individual; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED, a
California corporation,

17 Plaintiffs,

18 v.

19 ROBERT BONTA, in his official
20 capacity as Attorney General of the State
of California; and DOES 1-10,

21 Defendants.

CASE NO.: 8:22-cv-01421-CJC(ADSx)

**STIPULATION TO DISMISS
SECOND CLAIM FOR RELIEF
WITH PREJUDICE**

22
23 STIPULATION

24 WHEREAS, Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome
25 Schammel, and California Rifle & Pistol Association, Incorporated, have agreed with
26 Defendant Robert Bonta to dismiss WITH PREJUDICE the claim for relief in the
27 operative complaint entitled Second Claim for Relief for Unconstitutional Discrimination
28 Against Interstate Commerce, in consideration for Defendant waiving any claim for

1 attorney’s fees and costs of suit under California Code of Civil Procedure section 1021.11
2 arising from such dismissal; and

3 WHEREAS, Plaintiffs will effectuate such dismissal by this stipulation and by
4 filing within the time limits allowed under FED R. CIV. P. 15 an amended pleading (as
5 extended by prior stipulation and order) reflecting that such claim has been dismissed;

6 THEREFORE, the Parties hereby stipulate to such dismissal and request that the
7 Court enter a dismissal with prejudice of Plaintiffs’ Second Claim for Relief as to all
8 Defendants.

9 Respectfully Submitted,

10
11 Dated: September 22, 2022

MICHEL & ASSOCIATES, P.C.

/s/ C.D. Michel
C.D. Michel
Counsel for Plaintiffs
e-mail: cmichel@michellawyers.com

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14
15 Dated: September 22, 2022

ROB BONTA
Attorney General of California
MARK R. BECKINGTON
Supervising Deputy Attorney General

/s/ Robert L. Meyerhoff
ROBERT L. MEYERHOFF
Deputy Attorney General

*Attorneys for Rob Bonta in his official
capacity as Attorney General for the
State of California*

1
2 **CERTIFICATE OF SERVICE**

3 IN THE UNITED STATES DISTRICT COURT
4 CENTRAL DISTRICT OF CALIFORNIA

5 Case Name: *Boland, et al. v. Bonta*

6 Case No.: 8:22-cv-01421-CJC(ADSx)

7 IT IS HEREBY CERTIFIED THAT:

8 I, the undersigned, am a citizen of the United States and am at least eighteen
9 years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach,
10 California 90802.

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

12 **STIPULATION TO DISMISS SECOND CLAIM FOR RELIEF WITH
13 PREJUDICE**

14 on the following party by electronically filing the foregoing with the Clerk of the
15 District Court using its ECF System, which electronically notifies them.

16 Robert L. Meyerhoff, Deputy Attorney General
robert.meyerhoff@doj.ca.gov
17 300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed September 22, 2022.

20 
21 Christina Castron