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8
 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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 13 **LANCE BOLAND, AN INDIVIDUAL;
 MARIO SANTELLAN, AN
 14 INDIVIDUAL; RENO MAY, AN
 INDIVIDUAL, JEROME SCHAMMEL,
 15 AN INDIVIDUAL; AND CALIFORNIA
 RIFLE & PISTOL ASSOCIATION,
 16 INCORPORATED, A CALIFORNIA
 CORPORATION;**
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 Plaintiffs,
 18
 v.
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**ROBERT BONTA, IN HIS OFFICIAL
 20 CAPACITY AS ATTORNEY GENERAL OF
 CALIFORNIA,**
 21
 Defendant.
 22

Case No. 8:22-cv-01421-CJC-ADS
**DEFENDANT ROB BONTA IN HIS
 OFFICIAL CAPACITY AS
 ATTORNEY GENERAL OF THE
 STATE OF CALIFORNIA’S
 ANSWER TO AMENDED
 COMPLAINT FOR
 DECLARATORY AND
 INJUNCTIVE RELIEF**
 Judge: Hon. Cormac J. Carney
 Courtroom: 9B
 Complaint served: August 4, 2022

1 Defendant Rob Bonta, in his official capacity as Attorney General of the State
2 of California (the Attorney General), submits his answer in response to Plaintiffs’
3 Amended Complaint for Damages, Declaratory and Injunctive Relief (the
4 Complaint) (Dkt. No. 17). The Attorney General hereby answers the Complaint, in
5 paragraphs that correspond to the Complaint’s paragraphs, as follows:¹

6 **INTRODUCTION²**

7 1. Paragraph No. 1. This paragraph consists of allegations that contain
8 argument and legal contentions and legal authorities that speak for themselves,
9 requiring no response by the Attorney General. To the extent that a response is
10 required, the Attorney General denies each and every allegation.

11 2. Paragraph No. 2. This paragraph contains allegations that cite statutory
12 provisions, which speak for themselves. The Attorney General denies any
13 allegations that misstate the law. To the extent that a further response is required,
14 the Attorney General denies each and every other allegation.

15 3. Paragraph No. 3. The Attorney General lacks sufficient information or
16 belief to respond to the allegations in this paragraph, and on that basis denies each
17 and every allegation.

18 4. Paragraph No. 4. The Attorney General lacks sufficient information or
19 belief to respond to the allegations in this paragraph, and on that basis denies each
20 and every allegation.

21 5. Paragraph No. 5. This paragraph consists of allegations that contain
22 argument and legal contentions and legal authorities that speak for themselves,
23 requiring no response by the Attorney General. To the extent that a response is
24 required, the Attorney General denies each and every allegation.

25 _____
26 ¹ The following responses to each paragraph include responses to any
footnotes that may be contained in the relevant paragraph.

27 ² For the convenience of the Court and the parties, the Attorney General
utilizes certain headings as set forth in the Complaint. In doing so, the Attorney
28 General neither admits nor denies any allegations that may be suggested by the
Complaint’s headings.

1 6. Paragraph No. 6. This paragraph consists of allegations that contain
2 argument and legal contentions and legal authorities that speak for themselves,
3 requiring no response by the Attorney General. To the extent that a response is
4 required, the Attorney General denies each and every allegation.

5 7. Paragraph No. 7. This paragraph consists of allegations that contain
6 argument and legal contentions that speak for themselves, requiring no response by
7 the Attorney General. To the extent that a response is required, the Attorney
8 General denies each and every allegation.

9 8. Paragraph No. 8. The Attorney General admits that there are
10 approximately 800 handguns listed on the Roster for Certified Handguns. The
11 Attorney General lacks sufficient information or belief to respond to the remaining
12 allegations in this paragraph, and on that basis denies each and every remaining
13 allegation.

14 9. Paragraph No. 9. This paragraph consists of allegations that contain
15 argument and legal contentions and legal authorities that speak for themselves,
16 requiring no response by the Attorney General. To the extent that a response is
17 required, the Attorney General denies each and every allegation.

18 10. Paragraph No. 10. This paragraph consists of allegations that contain
19 argument and legal contentions that speak for themselves, requiring no response by
20 the Attorney General. To the extent that a response is required, the Attorney
21 General denies each and every allegation.

22 11. Paragraph No. 11. This paragraph consists of allegations that contain
23 argument and legal contentions that speak for themselves, requiring no response by
24 the Attorney General. To the extent that a response is required, the Attorney
25 General denies each and every allegation.

26 12. Paragraph No. 12. This paragraph consists of allegations that contain
27 argument and legal contentions and legal authorities that speak for themselves,
28

1 requiring no response by the Attorney General. To the extent that a response is
2 required, the Attorney General denies each and every allegation.

3 13. Paragraph No. 13. This paragraph consists of allegations that contain
4 argument and legal contentions and legal authorities that speak for themselves,
5 requiring no response by the Attorney General. To the extent that a response is
6 required, the Attorney General denies each and every allegation.

7 14. Paragraph No. 14. This paragraph consists of allegations that contain
8 argument and legal contentions and legal authorities that speak for themselves,
9 requiring no response by the Attorney General. To the extent that a response is
10 required, the Attorney General denies each and every allegation.

11 **CALIFORNIA’S “UNSAFE HANDGUN ACT” IN DETAIL**

12 15. Paragraph No. 15. The Attorney General lacks sufficient information or
13 belief to respond to the allegations in this paragraph, and on that basis denies each
14 and every allegation.

15 16. Paragraph No. 16. This paragraph consists of allegations that contain
16 argument and legal contentions and legal authorities that speak for themselves,
17 requiring no response by the Attorney General. To the extent that a response is
18 required, the Attorney General denies each and every allegation.

19 17. Paragraph No. 17. The Attorney General admits that the UHA was
20 enacted by the Legislature in 1999. The Attorney General lacks sufficient
21 information or belief to respond to the remaining allegations in this paragraph, and
22 on that basis denies each and every remaining allegation.

23 18. Paragraph No. 18. This paragraph contains allegations that cite statutory
24 provisions, which speak for themselves. The Attorney General denies any
25 allegations that misstate the law. To the extent that a further response is required,
26 the Attorney General denies each and every other allegation.

27 19. Paragraph No. 21. This paragraph contains allegations that cite statutory
28 provisions, which speak for themselves. The Attorney General denies any

1 allegations that misstate the law. To the extent that a further response is required,
2 the Attorney General denies each and every other allegation.

3 20. Paragraph No. 20. This paragraph contains allegations that cite statutory
4 provisions, which speak for themselves. The Attorney General denies any
5 allegations that misstate the law. To the extent that a further response is required,
6 the Attorney General denies each and every other allegation.

7 21. Paragraph No. 21. This paragraph contains allegations that cite statutory
8 provisions, which speak for themselves. The Attorney General denies any
9 allegations that misstate the law. To the extent that a further response is required,
10 the Attorney General denies each and every other allegation.

11 22. Paragraph No. 22. The Attorney General admits that the UHA has been
12 amended since its enactment in 1999. The remainder of this paragraph consists of
13 allegations that contain argument and legal contentions that speak for themselves,
14 requiring no response by the Attorney General. To the extent that a response is
15 required, the Attorney General denies each and every such allegation.

16 23. Paragraph No. 23. This paragraph consists of allegations that contain
17 argument and legal contentions and legal authorities that speak for themselves,
18 requiring no response by the Attorney General. To the extent that a response is
19 required, the Attorney General denies each and every allegation.

20 24. Paragraph No. 24. The Attorney General admits that California Penal
21 Code sections 16380 and 16900 define a “chamber load indicator” as a device that
22 plainly indicates that a cartridge is in the firing chamber and a “magazine
23 disconnect mechanism” as a mechanism that prevents a semiautomatic pistol that
24 has a detachable magazine from operating to strike the primer of ammunition in the
25 firing chamber when a detachable magazine is not inserted in the semiautomatic
26 pistol. The remainder of this paragraph consists of allegations which cite statutory
27 provisions, which speak for themselves. The Attorney General denies any
28

1 allegations that misstate the law. To the extent that a further response is required,
2 the Attorney General denies each and every other allegation.

3 25. Paragraph No. 25. This paragraph contains allegations that cite statutory
4 provisions, which speak for themselves. The Attorney General denies any
5 allegations that misstate the law. To the extent that a further response is required,
6 the Attorney General denies each and every other allegation.

7 26. Paragraph No. 26. This paragraph contains allegations that cite statutory
8 provisions, which speak for themselves. The Attorney General denies any
9 allegations that misstate the law. To the extent that a further response is required,
10 the Attorney General denies each and every other allegation.

11 27. Paragraph No. 27. This paragraph consists of allegations that contain
12 argument and legal contentions that speak for themselves, requiring no response by
13 the Attorney General. To the extent that a response is required, the Attorney
14 General denies each and every allegation.

15 28. Paragraph No. 28. This paragraph consists of allegations that contain
16 argument and legal contentions and legal authorities that speak for themselves,
17 requiring no response by the Attorney General. To the extent that a response is
18 required, the Attorney General denies each and every allegation.

19 29. Paragraph No. 29. This paragraph consists of allegations that contain
20 argument and legal contentions that speak for themselves, requiring no response by
21 the Attorney General. To the extent that a response is required, the Attorney
22 General denies each and every allegation.

23 30. Paragraph No. 30. The Attorney General admits that there are
24 approximately 800 handguns listed on the Roster for Certified Handguns. The
25 remainder of this paragraph consists of allegations that contain argument and legal
26 contentions and legal authorities that speak for themselves, requiring no response
27 by the Attorney General. To the extent that a response is required, the Attorney
28 General denies each and every such allegation.

1 31. Paragraph No. 31. This paragraph consists of allegations that contain
2 argument and legal contentions that speak for themselves, requiring no response by
3 the Attorney General. To the extent that a response is required, the Attorney
4 General denies each and every allegation.

5 32. Paragraph No. 32. This paragraph consists of allegations that contain
6 argument and legal contentions that speak for themselves, requiring no response by
7 the Attorney General. To the extent that a response is required, the Attorney
8 General denies each and every allegation.

9 33. Paragraph No. 33. This paragraph consists of allegations that contain
10 argument and legal contentions that speak for themselves, requiring no response by
11 the Attorney General. To the extent that a response is required, the Attorney
12 General denies each and every allegation.

13 34. Paragraph No. 34. This paragraph consists of allegations that contain
14 argument and legal contentions that speak for themselves, requiring no response by
15 the Attorney General. To the extent that a response is required, the Attorney
16 General denies each and every allegation.

17 35. Paragraph No. 35. This paragraph consists of allegations that contain
18 argument and legal contentions that speak for themselves, requiring no response by
19 the Attorney General. To the extent that a response is required, the Attorney
20 General denies each and every allegation.

21 36. Paragraph No. 36. The Attorney General admits that handguns that are
22 not on the Roster are generally known as “Off-Roster” handguns. The remainder of
23 this paragraph consists of allegations that contain argument and legal contentions
24 and legal authorities that speak for themselves, requiring no response by the
25 Attorney General. To the extent that a response is required, the Attorney General
26 denies each and every such allegation.

27 **HISTORY OF MICROSTAMPING AND RECENT DEVELOPMENTS**
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1 37. Paragraph No. 37. The Attorney General admits that on May 17, 2013,
2 the California Department of Justice, Division of Law Enforcement, issued a
3 bulletin stating that the microstamping technology is available to more than one
4 manufacturer unencumbered by any patent restrictions. The remainder of this
5 paragraph consists of allegations that contain argument and legal contentions and
6 legal authorities that speak for themselves, requiring no response by the Attorney
7 General. To the extent that a response is required, the Attorney General denies
8 each and every such allegation.

9 38. Paragraph No. 38. This paragraph consists of allegations that contain
10 argument and legal contentions and legal authorities that speak for themselves,
11 requiring no response by the Attorney General. To the extent that a response is
12 required, the Attorney General denies each and every allegation.

13 39. Paragraph No. 39. The Attorney General admits that the Governor
14 approved Assembly Bill 2847 on September 29, 2000. The remainder of this
15 paragraph consists of allegations that contain argument and legal contentions and
16 legal authorities that speak for themselves, requiring no response by the Attorney
17 General. To the extent that a response is required, the Attorney General denies
18 each and every such allegation.

19 40. Paragraph No. 40. The Attorney General lacks sufficient information or
20 belief to respond to the allegation that no manufacturer offers microstamping of any
21 type on any handgun. The remainder of this paragraph consists of allegations that
22 contain argument and legal contentions that speak for themselves, requiring no
23 response by the Attorney General. To the extent that a response is required, the
24 Attorney General denies each and every allegation.

25 41. Paragraph No. 41. The Attorney General lacks sufficient information or
26 belief to respond to the allegation that microstamping technology does not actually
27 exist in any commercially available application on a handgun. The remainder of
28 this paragraph consists of allegations that contain argument and legal contentions

1 that speak for themselves, requiring no response by the Attorney General. To the
2 extent that a response is required, the Attorney General denies each and every
3 allegation.

4 42. Paragraph No. 42. This paragraph consists of allegations that contain
5 argument and legal contentions that speak for themselves, requiring no response by
6 the Attorney General. To the extent that a response is required, the Attorney
7 General denies each and every allegation.

8 43. Paragraph No. 43. The Attorney General admits that there is a surfeit of
9 stolen weapons in the black market. The remainder of this paragraph consists of
10 allegations that contain argument and legal contentions and legal authorities that
11 speak for themselves, requiring no response by the Attorney General. To the extent
12 that a response is required, the Attorney General denies each and every such
13 allegation.

14 **JURISDICTION AND VENUE**

15 44. Paragraph No. 44. This paragraph consists of allegations that contain
16 argument and legal contentions and legal authorities that speak for themselves,
17 requiring no response by the Attorney General. To the extent that a response is
18 required, the Attorney General denies each and every allegation.

19 45. Paragraph No. 45. This paragraph consists of allegations that contain
20 argument and legal contentions and legal authorities that speak for themselves,
21 requiring no response by the Attorney General. To the extent that a response is
22 required, the Attorney General denies each and every allegation.

23 46. Paragraph No. 46. The Attorney General lacks sufficient information or
24 belief to respond to the allegation that all but one of the Plaintiffs reside in the
25 Central District of California, Southern Division. The remainder of this paragraph
26 consists of allegations that contain argument and legal contentions that speak for
27 themselves, requiring no response by the Attorney General. To the extent that a
28 response is required, the Attorney General denies each and every allegation.

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PARTIES

[Plaintiffs]

47. Paragraph No. 47. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

48. Paragraph No. 48. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

49. Paragraph No. 49. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

50. Paragraph No. 50. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

51. Paragraph No. 51. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

52. Paragraph No. 52. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

53. Paragraph No. 53. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

54. Paragraph No. 54. The Attorney General lacks sufficient information or belief to respond to the allegations in this paragraph, and on that basis denies each and every allegation.

[Defendants]

1 61. Paragraph No. 61. This paragraph consists of allegations that contain
2 argument and legal contentions and legal authorities that speak for themselves,
3 requiring no response by the Attorney General. To the extent that a response is
4 required, the Attorney General denies each and every allegation.

5 62. Paragraph No. 62. This paragraph consists of allegations that contain
6 argument and legal contentions and legal authorities that speak for themselves,
7 requiring no response by the Attorney General. To the extent that a response is
8 required, the Attorney General denies each and every allegation.

9 63. Paragraph No. 63. This paragraph consists of allegations that contain
10 argument and legal contentions and legal authorities that speak for themselves,
11 requiring no response by the Attorney General. To the extent that a response is
12 required, the Attorney General denies each and every allegation.

13 64. Paragraph No. 64. This paragraph consists of allegations that contain
14 argument and legal contentions and legal authorities that speak for themselves,
15 requiring no response by the Attorney General. To the extent that a response is
16 required, the Attorney General denies each and every allegation.

17 65. Paragraph No. 65. This paragraph consists of allegations that contain
18 argument and legal contentions and legal authorities that speak for themselves,
19 requiring no response by the Attorney General. To the extent that a response is
20 required, the Attorney General denies each and every allegation.

21 66. Paragraph No. 66. This paragraph consists of allegations that contain
22 argument and legal contentions and legal authorities that speak for themselves,
23 requiring no response by the Attorney General. To the extent that a response is
24 required, the Attorney General denies each and every allegation.

25 67. Paragraph No. 67. This paragraph consists of allegations that contain
26 argument and legal contentions and legal authorities that speak for themselves,
27 requiring no response by the Attorney General. To the extent that a response is
28 required, the Attorney General denies each and every allegation.

1 68. Paragraph No. 68. This paragraph consists of allegations that contain
2 argument and legal contentions and legal authorities that speak for themselves,
3 requiring no response by the Attorney General. To the extent that a response is
4 required, the Attorney General denies each and every allegation.

5 69. Paragraph No. 69. This paragraph consists of allegations that contain
6 argument and legal contentions and legal authorities that speak for themselves,
7 requiring no response by the Attorney General. To the extent that a response is
8 required, the Attorney General denies each and every allegation.

9 70. Paragraph No. 70. This paragraph consists of allegations that contain
10 argument and legal contentions and legal authorities that speak for themselves,
11 requiring no response by the Attorney General. To the extent that a response is
12 required, the Attorney General denies each and every allegation.

13 71. Paragraph No. 71. This paragraph consists of allegations that contain
14 argument and legal contentions and legal authorities that speak for themselves,
15 requiring no response by the Attorney General. To the extent that a response is
16 required, the Attorney General denies each and every allegation.

17 72. Paragraph No. 72. This paragraph consists of allegations that contain
18 argument and legal contentions that speak for themselves, requiring no response by
19 the Attorney General. To the extent that a response is required, the Attorney
20 General denies each and every allegation.

21 73. Paragraph No. 73. This paragraph consists of allegations that contain
22 argument and legal contentions that speak for themselves, requiring no response by
23 the Attorney General. To the extent that a response is required, the Attorney
24 General denies each and every allegation.

25 74. Paragraph No. 74. The Attorney General lacks sufficient information or
26 belief to respond to the allegation that there is not a single commercially available
27 firearm that has microstamping technology as of the filing of the Complaint. The
28 remainder of this paragraph consists of allegations that contain argument and legal

1 contentions that speak for themselves, requiring no response by the Attorney
2 General. To the extent that a response is required, the Attorney General denies
3 each and every allegation.

4 75. Paragraph No. 75. This paragraph consists of allegations that contain
5 argument and legal contentions and legal authorities that speak for themselves,
6 requiring no response by the Attorney General. To the extent that a response is
7 required, the Attorney General denies each and every allegation.

8 **DECLARATORY RELIEF ALLEGATIONS**

9 76. Paragraph No. 76. This paragraph consists of allegations that contain
10 argument and legal contentions that speak for themselves, requiring no response by
11 the Attorney General. To the extent that a response is required, the Attorney
12 General denies each and every allegation.

13 **INJUNCTIVE RELIEF ALLEGATIONS**

14 77. Paragraph No. 77. This paragraph consists of allegations that contain
15 argument and legal contentions that speak for themselves, requiring no response by
16 the Attorney General. To the extent that a response is required, the Attorney
17 General denies each and every allegation.

18 78. Paragraph No. 78. This paragraph consists of allegations that contain
19 argument and legal contentions that speak for themselves, requiring no response by
20 the Attorney General. To the extent that a response is required, the Attorney
21 General denies each and every allegation.

22 **FIRST CLAIM FOR RELIEF**

23 **Right to Keep and Bear Arms**

24 79. Paragraph No. 79. The Attorney General incorporates by reference the
25 answers in Paragraphs 1 through 78 above.

26 80. Paragraph No. 80. This paragraph consists of allegations that contain
27 argument and legal contentions that speak for themselves, requiring no response by
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1 the Attorney General. To the extent that a response is required, the Attorney
2 General denies each and every allegation.

3 81. Paragraph No. 81. This paragraph consists of allegations that contain
4 argument and legal contentions that speak for themselves, requiring no response by
5 the Attorney General. To the extent that a response is required, the Attorney
6 General denies each and every allegation.

7 82. Paragraph No. 82. This paragraph consists of allegations that contain
8 argument and legal contentions that speak for themselves, requiring no response by
9 the Attorney General. To the extent that a response is required, the Attorney
10 General denies each and every allegation.

11 83. Paragraph No. 83. This paragraph consists of allegations that contain
12 argument and legal contentions and legal authorities that speak for themselves,
13 requiring no response by the Attorney General. To the extent that a response is
14 required, the Attorney General denies each and every allegation.

15 84. Paragraph No. 84. This paragraph consists of allegations that contain
16 argument and legal contentions that speak for themselves, requiring no response by
17 the Attorney General. To the extent that a response is required, the Attorney
18 General denies each and every allegation.

19 85. Paragraph No. 85. This paragraph consists of allegations that contain
20 argument and legal contentions that speak for themselves, requiring no response by
21 the Attorney General. To the extent that a response is required, the Attorney
22 General denies each and every allegation.

23 86. Paragraph No. 86. This paragraph consists of allegations that contain
24 argument and legal contentions that speak for themselves, requiring no response by
25 the Attorney General. To the extent that a response is required, the Attorney
26 General denies each and every allegation.

27 The Attorney General denies that Plaintiffs are entitled to the relief set forth in
28 the Prayer for Relief immediately following paragraph 86, or to any relief

1 whatsoever. To the extent that the Prayer for Relief states any allegations, the
2 Attorney General denies them.

3 In addition, without admitting any allegations contained in the complaint, the
4 Attorney General asserts the following defenses based on information and belief:

5 **FIRST AFFIRMATIVE DEFENSE**

6 The Complaint, and the claims for relief alleged therein, fails to state facts
7 sufficient to constitute a cause of action against the Attorney General.

8 **SECOND AFFIRMATIVE DEFENSE**

9 Plaintiffs' claims in this action are barred in that Plaintiffs do not have
10 standing to bring them.

11 **THIRD AFFIRMATIVE DEFENSE**

12 The Complaint, and each cause of action therein, is improper as Plaintiffs have
13 an adequate remedy at law.

14 **FOURTH AFFIRMATIVE DEFENSE**

15 The Complaint, and every cause of action therein, is barred by the equitable
16 doctrines of estoppel, laches, unclean hands, and/or waiver.

17 **FIFTH AFFIRMATIVE DEFENSE**

18 To the extent that the Attorney General has undertaken any conduct with
19 regard to the subjects and events underlying Plaintiffs' Complaint, such conduct
20 was, at all times material thereto, undertaken in good faith and in reasonable
21 reliance on existing law.

22 **SIXTH AFFIRMATIVE DEFENSE**

23 The Attorney General has not knowingly or intentionally waived any
24 applicable affirmative defense. The Attorney General reserves the right to assert
25 and rely upon other such defenses as may become available or apparent during
26 discovery proceedings or as may be raised or asserted by others in this case, and to
27 amend the Answer and/or affirmative defenses accordingly. The Attorney General
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1 further reserves the right to amend the Answer to delete affirmative defenses that he
2 determines are not applicable after subsequent discovery.

3 WHEREFORE, the Attorney General prays that:

- 4 1. Plaintiffs take nothing by reason of the Complaint;
5 2. Judgment be entered in favor of the Attorney General;
6 3. The Attorney General be awarded costs incurred in defending this action;

7 and

8 4. The Attorney General be awarded such further relief that the Court may
9 deem just and proper.

10 Dated: October 7, 2022

Respectfully submitted,

11
12 ROB BONTA
Attorney General of California
13 MARK BECKINGTON
Supervising Deputy Attorney General
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15
16 /s/ Robert L. Meyerhoff
ROBERT L. MEYERHOFF
Deputy Attorney General
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18 *Attorneys for Defendant Rob Bonta*
in his Official Capacity as Attorney
General of the State of California
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CERTIFICATE OF SERVICE

Case Name: Boland, et al. v. Bonta No. 8:22-cv-01421-CJC-ADS

I hereby certify that on October 7, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**DEFENDANT ROB BONTA IN HIS OFFICIAL CAPACITY AS ATTORNEY
GENERAL OF THE STATE OF CALIFORNIA'S ANSWER TO AMENDED
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on October 7, 2022, at Los Angeles, California.

Robert Leslie Meyerhoff

Declarant

Robert M

Signature