

1 C.D. Michel – SBN 144258
cmichel@michellawyers.com
2 Joshua Robert Dale – SBN 209942
jdale@michellawyers.com
3 Sean A. Brady – SBN 262007
sbrady@michellawyers.com
4 Alexander A. Frank – SBN 311718
afrank@michellawyers.com
5 Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com

6 MICHEL & ASSOCIATES, P.C.
7 180 E. Ocean Boulevard, Suite 200
Long Beach, CA 90802
8 Telephone: (562) 216-4444
Facsimile: (562) 216-4445

9 Attorneys for Plaintiffs Lance Boland, Mario
10 Santellan, Reno May, Jerome Schammel, and
California Rifle & Pistol Association,
11 Incorporated

12 ROB BONTA
Attorney General of California
13 MARK R. BECKINGTON
Supervising Deputy Attorney General
14 ROBERT L. MEYERHOFF, SBN 298196
GABRIELLE D. BOUTIN, SBN 267308
15 S. CLINTON WOODS, SBN 246054
CHARLES J. SAROSY, SBN 302439
16 1300 I Street, Suite 125
P.O. Box 944255
17 Sacramento, CA 94244-2550
Telephone: (916) 210-6053
18 Fax: (916) 324-8835
E-mail: Charles.Sarosy@doj.ca.gov
19 *Attorneys for Rob Bonta, in his official capacity as*
Attorney General of the State of California

20
21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**
23 **SOUTHERN DIVISION**

24 LANCE BOLAND, an individual;
MARIO SANTELLAN, an individual;
25 RENO MAY, an individual; JEROME
SCHAMMEL, an individual;
26 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED, a
27 California corporation,

28 Plaintiffs,

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

**PLAINTIFFS' AND DEFENDANT'S
STIPULATION AS TO EXHIBITS
ADMITTED AT EVIDENTIARY
HEARING ON MOTION FOR
PRELIMINARY INJUNCTION AND
LODGING OF EXHIBITS**

v.

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

Defendants.

WHEREAS an evidentiary hearing on Plaintiffs' Motion for Preliminary Injunction was held on January 23-24, 2023 in this matter where exhibits were presented and moved into evidence, it is stipulated by Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome Schammel, and California Rifle & Pistol Association, Incorporated, and Defendant Robert Bonta, that the following is a true and correct list of the exhibits admitted at the January 23-24, 2023 hearing:

Exhibit Number:	Description:	No. of Pages
Plaintiffs' Exh. 1	Picture Depicting Loaded Chamber Indicator on Shotgun (red background)	1
Plaintiffs' Exh. 2	Picture Depicting Loaded Chamber Indicator on Shotgun (with action open)	1
Plaintiffs' Exh. 3	Webpage of fnamerica.com Depicting FN High Power Pistol	11
Plaintiffs' Exh. 4	Webpage of doj.ca.gov : "De-Certified Handgun Models"	85
Plaintiffs' Exh. 5	Webpage of smith-wesson.com : "Shield Series" (California compliant model)	1
Plaintiffs' Exh. 6	Webpage of smith-wesson.com : "Shield M2.0 Series" (non-California compliant model)	1
Plaintiffs' Exh. 7	NSSF Report: "Firearm and Ammunition Industry Economic Impact Report 2022"	7
Plaintiffs' Exh. 8	c.v. of Clayton E. Cramer	6
Plaintiffs' Exh. 9	Saul Cornell: " 'Don't Know Much About History' The Current Crisis in Second Amendment Scholarship," 29 N. Ky. L. Rev. 657 (2002)	26
Plaintiffs' Exh. 10	Webpage of scotusblog.com : Saul Cornell, "Cherry-picked history and ideology-driven outcomes: Bruen's originalist distortions" (June 27, 2022)	5

1	Plaintiffs' Exh. 11	Saul Cornell: "The Right to Regulate Arms in the Era of the Fourteenth Amendment: The Emergence of Good Cause Permit Schemes in Post-Civil War America," 55 Davis L. Rev. 65 (2022)	26
2			
3			
4	Plaintiff's Exh. 1 to Request for Judicial Notice I/S/O Mtn. for Preliminary Injunction	Webpages of doj.ca.gov : "California Roster of Handguns Certified For Sale" (ECF Dkt. No. 24-1)	217
5			
6	Defendant's Exh. 1	Curriculum Vitae of Special Agent Supervisor Salvador Gonzalez	3
7			
8	Defendant's Exh. 2	Screenshot of Search Function for Handgun Roster on Bureau of Firearms' Website (Source: California Department of Justice, https://oag.ca.gov/firearms/certified-handguns/search [last visited Jan. 18, 2023])	1
9			
10			
11	Defendant's Exh. 3	Photographs of North American Arms, Model NAA-22MS (Revolver)	1
12			
13	Defendant's Exh. 4	Photographs of Sturm, Ruger, & Co., Model KSP-321X (Revolver)	1
14			
15	Defendant's Exh. 5	Photographs of Kahr Arms, Model M9098A (Pistol)	1
16			
17	Defendant's Exh. 6	Photographs of Smith & Wesson, Model M&P9 Shield Black (Pistol)	1
18			
19	Defendant's Exh. 7	Photographs of Chamber Load Indicator in Smith & Wesson, Model M&P9 Shield Black (Pistol)	2
20			
21	Defendant's Exh. 8	Photographs of Magazine Disconnect Mechanism in Smith & Wesson, Model M&P9 Shield Black (Pistol)	2
22			
23	Defendant's Exh. 9	Photographs of Franklin Armory, Model CA320 (Pistol)	1
24			
25	Defendant's Exh. 10	Photographs of Smith & Wesson, Model M&P9 Shield Robin's Egg Blue (Pistol)	1
26			
27	Defendant's Exh. 11	Blank BOF 021 Compliance Test Report Form	4
28			
	Defendant's Exh. 12	United States General Accounting Office (GAO), Report to the Chairman, Subcommittee on Antitrust, Monopolies, and Business Rights, Committee on the Judiciary, U.S. Senate, <i>ACCIDENTAL SHOOTINGS: Many Deaths and Injuries Caused by Firearms Could Be Prevented</i> (March 1991)	52

1	Defendant's Exh. 13	Richard B. Ismach, et al., <i>Unintended Shootings in a Large Metropolitan Area: An Incident-Based Analysis</i> , 41:1 <i>Annals of Emergency Medicine</i> , 10-17 (January 2003)	8
2	Defendant's Exh. 14	J. S. Vernick, et al., <i>Unintentional and undetermined firearm related deaths: a preventable death analysis for three safety devices</i> , 9 <i>Injury Prevention</i> , 307-311 (2003)	5
3	Defendant's Exh. 15	Photographs of Wilson Combat, Model Tactical Elite, Ambi (Black) (WTE-A-A-CA) (Pistol)	1
4	Defendant's Exh. 16	Photographs of Heckler & Koch, Model P2000 SK-V3 (Pistol)	1
5	Defendant's Exh. 17	Photographs of Springfield Armory, Model XD9162 (Pistol)	1
6	Defendant's Exh. 18	Photographs of Sig Sauer, Model P229 (Black) 229R-9-BSS-CA (Pistol)	1
7	Defendant's Exh. 19	Photographs of Fabrique Nationale, Model FN Five-seven (Black) (FNH USA Fredericksburg, VA) (Pistol)	1
8	Defendant's Exh. 20	Photographs of Glock, Model 19 (Pistol)	1
9	Defendant's Exh. 21	Photographs of Glock, Model 26 (Pistol)	1
10	Defendant's Exh. 22	Photographs of Sturm, Ruger, & Co., Model LC380CA (Pistol)	1
11	Defendant's Exh. 23	Curriculum Vitae of Dr. Saul Cornell	15
12	Defendant's Exh. 24	Partial Compendium of Historical Primary Sources	18
13	Defendant's Exh. 25	Appellants' Answer Brief on the Merits, <i>National Shooting Sports Foundation, Inc., et al. v. State of California</i> , 5 Cal.5th 428 (2018) (No. S239397)	25
14	Defendant's Exh. 26	Wendy Wang, <i>Firearms micro-stamping feasible but not ideal, experts say</i> , <i>The California Aggie</i> (May 23, 2008), https://theaggie.org/2008/05/23/firearms-microstamping-feasible-but-not-ideal-experts-say/	2
15	Defendant's Exh. 27	Davie Howitt, PhD, et al., <i>What Micro Serialized Firing Pins Can Add to Firearm Identification in Forensic Science: How Viable are Micro-Marked Firing Pin Impressions as Evidence?</i> (2008)	50

Defendant’s Exh. 28	California Department of Justice Bureau of Firearms, <i>Invitation for Preliminary Comments on Proposed Rulemaking Regarding Firearm Microstamping (Dec. 23, 2022)</i>	3
Defendant’s Demonstrative Exh. 1	Microstamping diagram (Source: Microstamping: A Tool to Identify Crime Guns, Solve Shootings, and Hold Gun Traffickers Accountable, Johns Hopkins Bloomberg School of Public Health, Center for Gun Violence Solutions, 2 (2022), https://publichealth.jhu.edu/sites/default/files/2022-11/johns-hopkins-center-for-gun-violence-solutions-microstamping-memo-11-2022.pdf)	1
Defendant’s Demonstrative Exh. 2	Microstamping photos (Source: Microstamping: A Tool to Identify Crime Guns, Solve Shootings, and Hold Gun Traffickers Accountable, Johns Hopkins Bloomberg School of Public Health, Center for Gun Violence Solutions, 2 (2022), https://publichealth.jhu.edu/sites/default/files/2022-11/johns-hopkins-center-for-gun-violence-solutions-microstamping-memo-11-2022.pdf)	1

A copy of the above-listed exhibits are electronically lodged herewith.

Dated: January 27, 2023

MICHEL & ASSOCIATES, P.C.

/s/Sean A. Brady
 Sean A. Brady
 Counsel for Plaintiffs

Dated: January 27, 2023

Respectfully submitted,

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

/s/Charles J. Sarosy
 CHARLES J. SAROSY
 Deputy Attorney General
 Attorneys for Rob Bonta, in his official capacity as Attorney

CERTIFICATE OF SERVICE

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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

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

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:

**PLAINTIFFS' AND DEFENDANT'S STIPULATION AS TO EXHIBITS
ADMITTED AT EVIDENTIARY HEARING ON MOTION FOR PRELIMINARY
INJUNCTION AND LODGING OF EXHIBITS**

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

Robert L. Meyerhoff, Deputy Attorney General
robert.meyerhoff@doj.ca.gov
Gabrielle D. Boutin
Gabrielle.Boutin@doj.ca.gov
Charles J. Sarosy
charles.sarosy@doj.ca.gov
S. Clinton Woods
clint.woods@doj.ca.gov
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230

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

Executed January 27, 2023.


Christina Castron