

1 MICHAEL J. GARCIA, CITY ATTORNEY
EDWARD B. KANG, PRINCIPAL ASSISTANT CITY ATTORNEY, SBN: 237751
2 613 E. Broadway, Suite 220
Glendale, CA 91206
3 Telephone: (818) 548-2080
Facsimile: (818) 547-3402
4 Email: ekang@glendaleca.gov

5 Attorneys for Defendants,
CITY OF GLENDALE, GLENDALE CHIEF OF
6 POLICE CARL POVILAITIS; and GLENDALE
CITY CLERK SUZIE ABAJIAN
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 CALIFORNIA RIFLE & PISTOL)
ASSOCIATION, INCORPORATED;)
12 SECOND AMENDMENT)
FOUNDATION; GUN OWNERS OF)
13 CALIFORNIA, INC. NELSON GIBBS)
and JOHN LEYBA,)

14 Plaintiffs,)

15 vs.)

16 CITY OF GLENDALE; GLENDALE)
CHIEF OF POLICE CARL)
17 POVILAITIS, in his official capacity;)
18 GLENDALE CITY CLERK SUZIE)
ABAJIAN, in her official capacity; and)
19 DOES 1-10,)

20 Defendants.)

Case No.: 2:22-cv-07346-SB-JC

**STIPULATION TO CONTINUE
BRIEFING SCHEDULE AND
HEARING DATE ON RENEWED
MOTION FOR PRELIMINARY
INJUNCTION**

Complaint Served: October 18, 2022

Hon. Stanley Blumenfeld Jr.

1 IT IS HEREBY STIPULATED, by and between Plaintiffs California Rifle & Pistol
2 Association, Incorporated, Second Amendment Foundation, Gun Owners of California,
3 Inc., Nelson Gibbs and John Leyba (collectively “Plaintiffs”), and Defendants City of
4 Glendale, Glendale Chief of Police Carl Povilaitis, and Glendale City Clerk Suzie Abajian
5 (collectively “Defendants”), through their undersigned counsel, that the current briefing
6 schedule and hearing date on Plaintiff’s renewed motion for preliminary injunction be
7 continued for six (6) weeks.

8 Good cause exists to approve the instant stipulation as the parties have reached a
9 tentative settlement in this matter that is contingent on the Glendale City Council’s
10 approval of the tentative settlement and amendment of the Ordinance at issue as
11 contemplated by the tentative settlement. The parties thus need additional time to finalize
12 settlement in this matter and would like to conduct those efforts without having to spend
13 the time and expense in preparing and opposing a renewed motion for preliminary
14 injunction that may become unnecessary. Accordingly, approval of the instant stipulation
15 will promote judicial economy and conserve the Court’s and parties’ resources.

16 Accordingly, for the good cause stated above, the parties hereby stipulate that the
17 briefing schedule and hearing date on Plaintiffs’ renewed motion previously ordered by
18 the Court be continued as follows: Plaintiffs’ opening brief currently due on July 21, 2023
19 would now be due on September 1, 2023; Defendants opposition brief currently due on
20 August 4, 2023 would be due on September 15, 2023; Plaintiff’s reply brief and the
21 parties’ final chart of historical laws currently due on August 11, 2023 would be due on
22 September 22, 2023; and the hearing on the motion currently scheduled for September 1,
23 2023 would be held on October 13, 2023.

24
25 DATED: Julv 11. 2023

MICHEL & ASSOCIATES. P.C.

26
27 By: /s/Konstadinos T. Moros
28 Konstadinos T. Moros
Attorneys for Plaintiffs

1 DATED: July 11, 2023

MICHAEL J. GARCIA, CITY ATTORNEY

2
3 By: /s/Edward B. Kang

4 EDWARD B. KANG
5 Attorneys for Defendants

6
7 **ATTESTATION**

8 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories
9 listed, and on whose behalf the filing is submitted, concur in the filing’s content and have
10 authorized the filing.