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9 CITY OF GLENDALE, GLENDALE CHIEF OF
10 POLICE CARL POVILAITIS; and GLENDALE
11 CITY CLERK SUZIE ABAJIAN

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 CALIFORNIA RIFLE & PISTOL)
15 ASSOCIATION, INCORPORATED;)
16 SECOND AMENDMENT)
17 FOUNDATION; GUN OWNERS OF)
18 CALIFORNIA, INC. NELSON GIBBS)
19 and JOHN LEYBA,)

20 Plaintiffs,)

21 vs.)

22 CITY OF GLENDALE; GLENDALE)
23 CHIEF OF POLICE CARL)
24 POVILAITIS, in his official capacity;)
25 GLENDALE CITY CLERK SUZIE)
26 ABAJIAN, in her official capacity; and)
27 DOES 1-10,)

28 Defendants.)

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

**JOINT REQUEST TO EXTEND TIME
TO COMPLETE SETTLEMENT;
DECLARATIONS IN SUPPORT
THEREOF**

Complaint Served: October 18, 2022

Hon. Stanley Blumenfeld Jr.

1 Plaintiffs California Rifle & Pistol Association, Incorporated, Second Amendment
2 Foundation, Gun Owners of California, Inc., Nelson Gibbs and John Leyba (collectively
3 “Plaintiffs”), and Defendants City of Glendale, Glendale Chief of Police Carl Povilaitis,
4 and Glendale City Clerk Suzie Abajian (collectively “Defendants”) jointly request that the
5 Court extend the time for the parties to complete their settlement of this matter.

6 As further explained in the accompanying declarations of Edward B. Kang (“Kang
7 Declaration”) and Konstadinos Moros (“Moros Declaration”), good cause exists to grant
8 the parties’ request as the City requires additional time to complete settlement of this
9 matter. The City has taken longer than expected to prepare a revised draft ordinance (the
10 “Revised Ordinance”) and still requires additional time to prepare a Council Report, as
11 well as legislative findings and other materials in support of the proposed Revised
12 Ordinance. Currently, the City is working on such materials and has placed consideration
13 of the Revised Ordinance on the November 14, 2023 City Council agenda. The Revised
14 Ordinance would then come back for adoption at the November 28, 2023 City Council
15 meeting, which is the next City Council meeting following the November 14 meeting.

16 Accordingly, for the good cause stated above and explained more fully in the
17 accompanying declarations, the parties herby respectfully request that the Court extend the
18 time to complete settlement of this matter to December 13, 2023.

19 DATED: October 24, 2023

MICHEL & ASSOCIATES, P.C.

21 By: /s/Konstadinos T. Moros

22 Konstadinos T. Moros
23 Attorneys for Plaintiffs

24 DATED: October 24, 2023

MICHAEL J. GARCIA, CITY ATTORNEY

26 By: /s/Edward B. Kang

27 EDWARD B. KANG
28 Attorneys for Defendants

1 stipulate to another extension to address Plaintiffs’ concerns.

2 10. I responded that November 28 would not work because the cutoff date per
3 this Court’s order falls on November 20. I suggested the City Council schedule a special
4 meeting and finish approval of the settlement in the next week. Ultimately though, I did
5 not oppose another stipulation for one final extension, should the Court be willing to grant
6 it.

7 11. The Parties agreed to the instant stipulation on October 23, 2023.

8 I declare under penalty of perjury under the laws of the State of California and the
9 United States of America that the foregoing is true and correct.

10 Executed this 24th day of October, 2023 at Whittier, California.

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/s/Konstadinos T. Moros
Konstadinos T. Moros, Declarant