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18 Attorneys for Plaintiffs

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

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

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

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR PRELIMINARY  
INJUNCTION**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is hereby given that on December 4, 2023, at 1:30 p.m. in Courtroom  
3 9B of the above-captioned court, located at 411 West Fourth Street in Santa Ana  
4 California, Plaintiffs of Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary  
5 Brennan, Tony Barretto, Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Jose  
6 Flores, Andrew Harms, Dr. Sheldon Hough, DDS, The Second Amendment  
7 Foundation, Gun Owners of America, Gun Owners Foundation, Gun Owners of  
8 California, Inc., the Liberal Gun Club, Inc., and the California Rifle & Pistol  
9 Association, Incorporated (collectively, “Plaintiffs”) will move for a preliminary  
10 injunction under Rule 65(a) of the Federal Rules of Civil Procedure. Specifically,  
11 Plaintiffs will seek an order temporarily enjoining Defendant, his employees,  
12 agents, successors in office, and all other public officials or law enforcement  
13 officers in California, from enforcing California Penal Code § 26230, subds. (5),  
14 (7), (8), (9), (11), (12), (13), (17), (22), (23), and (26) against any individuals with  
15 concealed handgun licenses issued pursuant to California Penal Code sections  
16 26150 or 26155.

17 Plaintiffs bring this motion because California Penal Code § 26230, which  
18 will take effect on January 1, 2024, violates the rights of Plaintiffs’ members with  
19 concealed handgun licenses in two major ways: it prohibits them from carrying  
20 firearms in nearly every relevant place besides streets and sidewalks and it denies  
21 them due process by not requiring such places to post signs notifying them that  
22 guns are not allowed on a particular property. In addition, some Plaintiffs who are  
23 business owners raise First Amendment claims as well because § 26230 compels  
24 their speech if they desire to allow people to exercise their constitutional right to  
25 carry at their business.

26 This application is made on the grounds set forth in the accompanying  
27 memorandum of points and authorities; the signed declarations of each of the  
28 plaintiffs; the signed declaration of Clayton Cramer, the signed declaration of Brian

1 Marvel, the signed declaration of Moris Davidovitz, all pleadings and papers filed  
2 in this action, the argument of counsel, and further evidence as the Court may  
3 consider before ruling on the preliminary injunction requested herein.

4 Respectfully Submitted,

5  
6 Dated: September 29, 2023

**MICHEL & ASSOCIATES, P.C.**

*/s/ C.D. Michel*

C.D. Michel

Counsel for Plaintiffs

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10 Dated: September 29, 2023

**LAW OFFICES OF DON KILMER**

*/s/ Don Kilmer*

Don Kilmer

Counsel for Plaintiff Second Amendment  
Foundation

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14  
15 **ATTESTATION OF E-FILED SIGNATURES**

16 I, C.D. Michel, am the ECF User whose ID and password are being used to  
17 file this PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR  
18 PRELIMINARY INJUNCTION. In compliance with Central District of California  
19 L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have  
20 concurred in this filing.

21 Dated: September 29, 2023

*/s/ C.D. Michel*

C.D. Michel

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**CERTIFICATE OF SERVICE**  
**IN THE UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 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:

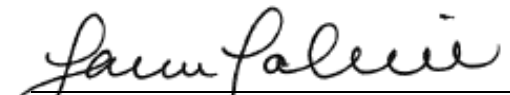
**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION**

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  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

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

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin