

1 ROB BONTA
Attorney General of California
2 R. MATTHEW WISE
Supervising Deputy Attorney General
3 CHRISTINA R.B. LÓPEZ
Deputy Attorney General
4 State Bar No. 312610
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6106
6 Fax: (916) 324-8835
E-mail: Christina.Lopez@doj.ca.gov
7 *Attorneys for Defendant Rob Bonta*

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10
11 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
12 THE SECOND AMENDMENT
FOUNDATION; GUN OWNERS OF
13 AMERICA, INC.; GUN OWNERS
FOUNDATION; GUN OWNERS OF
14 CALIFORNIA, INC.; ERICK
VELASQUEZ, an individual;
15 CHARLES MESSEL, an individual;
BRIAN WEIMER, an individual;
16 CLARENCE RIGALI, an individual;
KEITH REEVES, an individual;
17 CYNTHIA GABALDON, an individual;
and STEPHEN HOOVER, an
18 individual,

19 Plaintiffs,

20 v.

21 LOS ANGELES COUNTY SHERIFF'S
DEPARTMENT; SHERIFF ROBERT
22 LUNA, in his official capacity; LA
VERNE POLICE DEPARTMENT; LA
23 VERNE CHIEF OF POLICE
COLLEEN FLORES, in her official
24 capacity; ROBERT BONTA, in his
official capacity as Attorney General of
25 the State of California; and DOES 1-10,

26 Defendants.
27
28

2:23-cv-10169

**JOINT STATEMENT RE:
SUBMISSION OF PROPOSED
PRELIMINARY INJUNCTION
ORDER**

Judge: The Honorable Sherilyn
Peace Garnett

1 In the August 20, 2024 Order Granting in Part, Denying in Part, Plaintiffs’
2 Motion for Preliminary Injunction (Order, ECF No. 52), the Court ordered that,
3 within thirty (30) calendar days of the Order being entered, Plaintiffs meet and
4 confer with Defendant Robert Bonta and Defendants Los Angeles County Sheriff’s
5 Department and Sheriff Robert Luna (the Los Angeles Defendants), and to submit a
6 proposed order entering the preliminary injunction described in the Order. Order
7 44. Plaintiffs, the Los Angeles Defendants, and Defendant Bonta (the Parties) now
8 provide the following update on that process:

9 The Parties have been actively meeting and conferring in an attempt to agree
10 to the form of a proposed preliminary injunction that implements the findings in the
11 Order. Plaintiffs have reached an agreement with the Los Angeles Defendants as to
12 the language in the proposed order relevant to them. As of the time of this filing,
13 Plaintiffs and Defendant Robert Bonta have agreed to the form of most terms for a
14 proposed order as to him and continue to work toward agreement on a few
15 remaining terms. The Parties believe a single proposed order covering both matters
16 is more straightforward and serves interests of judicial economy. Because the
17 Parties believe that an agreement as to form between Plaintiffs and Defendant
18 Robert Bonta is possible in the coming days, the Parties jointly request the Court’s
19 indulgence to have until Monday, September 23, 2024 to meet the directive in the
20 Order described above. At that time, the Parties will file either 1) one proposed
21 order that is agreed as to form; or 2) two proposed orders with minimal
22 disagreements as to form.

23 //
24 //
25 //
26 //
27 //
28 //

1 Dated: September 19, 2024

Respectfully submitted,

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

s/ Christina R.B. López

CHRISTINA R.B. LÓPEZ
Deputy Attorney General
Attorneys for Defendant Rob Bonta

MICHEL & ASSOCIATES, P.C.

s/ Konstadinos Moros

KONSTADINOS MOROS
Attorneys for Plaintiffs

WILMER CUTLER PICKERING
HALE AND DORR LLP

s/ Ryan Chabot

RYAN CHABOT
*Attorneys for Defendants Los Angeles
County Sheriff's Department and
Defendant Robert Luna*