

1 ROB BONTA, State Bar No. 202668
Attorney General of California
2 ANTHONY R. HAKL, State Bar No. 197335
Supervising Deputy Attorney General
3 GABRIELLE D. BOUTIN, State Bar No. 267308
Deputy Attorney General
4 1300 I Street, Suite 125
Sacramento, CA 95814
5 Telephone: (916) 210-6053
Fax: (916) 324-8835
6 E-mail: Gabrielle.Boutin@doj.ca.gov
Attorneys for Defendant Attorney General Rob
7 *Bonta, in his official capacity*

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

<p>11 SAFARI CLUB INTERNATIONAL, et al.,</p> <p>12 Plaintiffs,</p> <p>13 v.</p> <p>14</p> <p>15 ROB BONTA, in his official capacity as Attorney General of the State of California, 16 et al.,</p> <p>17 Defendants.</p>	<p>2:22-cv-01395-DAD-JDP</p> <p>STIPULATION FOR ENTRY OF ORDER, FINAL JUDGMENT, AND PERMANENT INJUNCTION</p> <p>Judge: The Honorable Dale A. Drozd Trial Date: None set Action Filed: August 5, 2022</p>
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19 Plaintiffs The United States Sportsmen’s Alliance Foundation, Safari Club International,
20 and Congressional Sportsmen’s Foundation (collectively, “Plaintiffs”) and Defendant Rob Bonta,
21 in his official capacity as Attorney General of the State of California, (“Defendant” and, together
22 with Plaintiffs, the “Parties”) agree and stipulate as follows:

23 1. Plaintiffs and Defendant hereby consent and ask the Court to enter in this matter the
24 Order, Final Judgment, and Permanent Injunction attached to this Stipulation as “Exhibit 1.” The
25 Parties have agreed and stipulated to settle this action under the specific terms set forth in that
26 document.

27 2. This Court has jurisdiction over the subject matter of this lawsuit and the Parties.
28 Venue is proper in this Court.

1 3. Entry of the Order, Final Judgment, and Permanent Injunction will constitute the final
2 judgment in this matter.

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Dated: March 17, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
Deputy Attorney General
*Attorneys for Defendant Attorney General
Rob Bonta, in his official capacity*

Dated: March 17, 2026

SNELL & WILMER

*s/ Cameron Schlagel (as authorized on
March 12, 2026)*
Michael B. Reynolds
Colin R. Higgins
Cameron J. Schlagel
Attorneys for Plaintiffs

EXHIBIT 1

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

SAFARI CLUB INTERNATIONAL, et al.,

Plaintiffs,

v.

**ROB BONTA, in his official capacity as
Attorney General of the State of California,
et al.,**

Defendants.

2:22-cv-01395-DAD-JDP

**[PROPOSED] ORDER, FINAL
JUDGMENT, AND PERMANENT
INJUNCTION**

Judge: The Honorable Dale A. Drozd
Trial Date: None set
Action Filed: August 5, 2022

The Court having considered the parties’ Stipulation for Entry of Order, Final Judgment, and Permanent Injunction (“Stipulation”) and finding good cause,

IT IS HEREBY ORDERED as follows:

I. DEFINITIONS

For purposes of this Order, the following definitions apply:

1. “Section 22949.80” means section 22949.80 of the California Business and Professions Code.
2. “Plaintiffs” means Plaintiffs The United States Sportsmen’s Alliance Foundation, Safari Club International, and Congressional Sportsmen’s Foundation, and each of their successors and assigns.
3. “Defendant” means Defendant Rob Bonta, in his official capacity as Attorney General of the State of California, his successors in office, and each of their agents acting within the scope of their official duties.
4. “First Amended Complaint” means the First Amended Complaint filed in this action on October 18, 2022, ECF No. 12.

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II. JUDGMENT

Judgment is hereby entered in favor of Plaintiffs and against Defendant on the Second Claim for Relief in the First Amended Complaint, “Violation of First Amendment — Commercial Speech.” ECF No. 12 at 32. The Court dismisses the remaining claims with prejudice.

III. JUDICIAL DECLARATION

IT IS HEREBY DECLARED that Section 22949.80, in its entirety, violates the First Amendment of the United States Constitution on its face and as applied to Plaintiffs.

IV. PERMANENT INJUNCTION

IT IS HEREBY ORDERED that Defendant shall be permanently enjoined from enforcing any or all portions of section 22949.80, as against Plaintiffs or any other person or entity.

V. OTHER ORDERS

IT IS ORDERED that this Court shall retain jurisdiction of this matter for the purpose of enforcing this Order, Final Judgment, and Permanent Injunction.

IT IS ORDERED that Plaintiffs shall recover from Defendant the amount of \$481,749.72 in full compensation for the attorneys’ fees and costs incurred by Plaintiffs in connection with this action and the related appeals. This award is subject to the following terms, to which the Parties have agreed and stipulated:

1. Post-judgment interest on the attorneys’ fees and costs shall accrue immediately at a rate of 3.5% per annum (3.5%), compounded annually, but shall be stayed, abated, and shall not be owed by Defendant to Plaintiffs if the award of attorneys’ fees and costs is paid within 270 days of entry of this Judgment.

2. If Defendant fails to pay the agreed upon amount on or before 270 days from the date of entry of Judgment, Plaintiffs shall retain the right to seek additional attorneys’ fees, costs, and interest by noticed motion seeking more than the agreed-upon amount, and the Court retains jurisdiction to decide such a motion. In the event Defendant fails to comply with this portion of the Judgment, Plaintiffs may seek enforcement of this part of the Judgment, Defendant will not oppose the request for the amounts set out above, and Plaintiffs will not need to submit an

1 affidavit or other evidence to the Court in support of this original award for fees and costs, as
2 would otherwise be required.

3 3. In the event Defendant fails to comply with any portion of this Judgment, Plaintiffs
4 and/or their successors in interest shall be entitled to an award from Defendant of all legal
5 expenses incurred in enforcing Defendant's obligations hereunder, including but not limited to
6 reasonable attorneys' fees and interest on such expenses.

7 **IT IS ORDERED** that all other relief sought in First Amended Complaint is denied.

8 **FINAL JUDGMENT IS ENTERED** pursuant to the terms of this Order.

9 **IT IS SO ORDERED.**

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11 Dated: _____

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Hon. Dale A. Drozd
United States District Judge

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CERTIFICATE OF SERVICE

Case Name: **Safari Club International, et al.** No. **2:22-cv-01395-DAD-JDP**
v. Rob Bonta

I hereby certify that on March 17, 2026, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION FOR ENTRY OF ORDER, FINAL JUDGMENT,
AND PERMANENT INJUNCTION**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 17, 2026, at Davis, California.

Cecilia Apodaca
Declarant

/s/ Cecilia Apodaca
Signature