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9  
 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION  
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 15 **X CORP.,**

16 Plaintiff,

17 v.

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 19 **ROBERT A. BONTA, ATTORNEY GENERAL  
 OF CALIFORNIA, IN HIS OFFICIAL CAPACITY,**

20 Defendant.  
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2:23-CV-01939-WBS-AC

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

Judge: Hon. William B. Shubb  
 Trial Date: None set  
 Action Filed: Sept. 8, 2023

22 Plaintiff X Corp. and Defendant Rob Bonta, in his official capacity as Attorney General of  
 23 the State of California, (together, the “Parties”) stipulate as follows:  
 24

25 1. Plaintiff and Defendant hereby consent and ask the Court to enter in this matter the  
 26 Final Judgment and Permanent Injunction attached to this Stipulation as “Exhibit 1.”

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

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

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

3           4.     For the avoidance of doubt, the Parties' intent is for this judgment not to be construed  
4 as having the effect of res judicata, collateral estoppel, waiver, or admission as to Plaintiff in any  
5 suit or claim filed by Plaintiff against any non-party to this action challenging the  
6 constitutionality or validity of any law other than Assembly Bill 587.

7

8 Dated: February 24, 2025

Respectfully submitted,

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

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

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Dated: February 24, 2025

/s/ Joel Kurtzberg (as authorized on February 24, 2025)

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# Exhibit 1

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

**X CORP. ,**  
  
Plaintiff,  
  
**v.**  
  
**ROBERT A. BONTA, ATTORNEY GENERAL  
OF CALIFORNIA, IN HIS OFFICIAL  
CAPACITY,**  
  
Defendant.

2:23-CV-01939-WBS-AC

**FINAL JUDGMENT AND PERMANENT  
INJUNCTION**

Judge: Hon. William B. Shubb  
Trial Date: None set  
Action Filed: Sept. 8, 2023

The Court having considered the parties' Stipulation for Entry of Final Judgment and Permanent Injunction and finding good cause,

**IT IS HEREBY ORDERED** as follows:

**I. DEFINITIONS**

For purposes of this Order, the following definitions apply:

1. "Assembly Bill 587" means California Assembly Bill No. 587, passed by the California Legislature on August 30, 2022, during the 2021-2022 legislative session, and signed by the Governor of California on September 13, 2022. Assembly Bill 587's provisions are codified in sections 22675 through 22681 of the California Business and Professions Code.
2. "Section 22677" refers to California Business and Professions Code section 22677.

1 3. "Section 22678" refers to California Business and  
2 Professions Code section 22678.

3 4. "Plaintiff" refers to Plaintiff X Corp., its  
4 successors, and assigns.

5 5. "Defendant" refers to Defendant Rob Bonta, in his  
6 official capacity as Attorney General of the State of California,  
7 his successors in office, and their agents acting within the  
8 scope of their official duties.

9 6. "Complaint" refers to the Complaint for Declaratory and  
10 Injunctive Relief filed in this action on September 8, 2023, ECF  
11 No. 1.

## 12 II. JUDGMENT

13 Judgment is hereby entered in favor of Plaintiff and against  
14 Defendant on the First Cause of Action in the Complaint as to  
15 subdivisions (a) (3), (a) (4) (A), and (a) (5) of Section 22677. The  
16 Court dismisses the First Cause of Action in the Complaint, as to  
17 all remaining provisions of Assembly Bill 587, including all  
18 remaining provisions of Section 22677, with prejudice. The Court  
19 also dismisses the Second and Third Causes of Action in the  
20 Complaint with prejudice.

## 21 III. JUDICIAL DECLARATION

22 **IT IS HEREBY DECLARED** that subdivisions (a) (3), (a) (4) (A),  
23 and (a) (5) of California Business and Professions Code section  
24 22677 violate the First Amendment of the United States  
25 Constitution facially and as applied to Plaintiff.

## 26 III. PERMANENT INJUNCTION

27 **IT IS HEREBY ORDERED** that Defendant, as defined, shall be  
28 permanently enjoined from enforcing subdivisions (a) (3),

1 (a) (4) (A), and (a) (5) of California Business and Professions Code  
2 section 22677. Defendant shall also be permanently enjoined from  
3 enforcing Section 22678 insofar as that section applies to  
4 violations of subdivisions (a) (3), (a) (4) (A), and (a) (5) of  
5 California Business and Professions Code section 22677.

6 **IV. OTHER ORDERS**

7 **It is ORDERED** that this Court shall retain jurisdiction of  
8 this matter for the purpose of enforcing this Final Judgment and  
9 Permanent Injunction.

10 **It is ORDERED** that Plaintiff shall recover from Defendant  
11 the amount of \$345,576 in full compensation for the attorneys'  
12 fees and costs incurred by Plaintiff in connection with this  
13 action and the related preliminary injunction appeal.

14 **It is ORDERED** that all other relief sought in Complaint is  
15 denied.

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

18 **IT IS SO ORDERED.**

19  
20 Dated: \_\_\_\_\_

\_\_\_\_\_  
21 Hon. William B. Shubb  
22 United States District Judge  
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## CERTIFICATE OF SERVICE

Case Name: X Corp. v. Bonta No. 2:23-CV-01939-WBS-AC

I hereby certify that on February 24, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

### STIPULATION FOR ENTRY OF 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 February 24, 2025, at Sacramento, California.

Martha Ochoa  
Declarant

/s/Martha Ochoa  
Signature

SA2023304822