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21 *Counsel for The Babylon Bee, LLC*  
22 *and Kelly Chang Rickert*

23 \* *Local Counsel*

24 \*\**Admitted pro hac vice*

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

Christoper Kohls,

*Plaintiff,*

v.

Rob Bonta, et al.,

*Defendants.*

Case No. 2:24-cv-02527-JAM-CKD

**Stipulation to Consolidate**

**Judge:** John A. Mendez

The Babylon Bee, LLC, et al.

*Plaintiffs,*

v.

Rob Bonta, et al.,

*Defendants.*

Case No. 2:24-cv-02787-JAM-CKD

Rumble Inc., et al.

*Plaintiffs,*

v.

Rob Bonta, et al.

*Defendants.*

Case No. 2:24-cv-03315-JAM-CKD

**STIPULATION**

1. This Court recognized that the above-entitled actions are related within the meaning of Local Rule 123. Related Case Order, ECF No. 28. It previously ordered the *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD, and *The Babylon Bee, LLC v. Bonta*, No. 2:24-cv-02787-JAM-CKD, matters consolidated. Order Consolidating Cases, ECF No. 20.

1           2.       Plaintiffs in all three of the above-entitled actions challenge the same  
2 California statute: AB 2655 (Cal. Elec. Code § 20510). Plaintiffs Christopher Kohls,  
3 The Babylon Bee, LLC, and Kelly Chang Rickert also challenge AB 2839 (Cal. Elec.  
4 Code § 20012).

5           3.       Plaintiffs in all three of the above-entitled actions bring the same or  
6 similar constitutional claims against the same Defendants: California Attorney  
7 General Rob Bonta and Secretary of State Shirley N. Weber. Plaintiffs in *Rumble*  
8 also bring Section 230 claims against AB 2655 and against the same Defendants.

9           4.       All parties in the above-entitled matters consent to consolidation of  
10 these actions.

11           NOW THEREFORE, the parties hereby STIPULATE that:

12           5.       The above-entitled actions shall be consolidated for all purposes.  
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1 DATED: December 19, 2024

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3 s/ Johannes Widmalm-Delphonse

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28 s/ Mathew W. Hoffmann

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s/ Kristin A. Liska

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

Christoper Kohls,

*Plaintiff,*

v.

Rob Bonta, et al.,

*Defendants.*

Case No. 2:24-cv-02527-JAM-CKD

**ORDER to Consolidate**

**Judge:** John A. Mendez

The Babylon Bee, LLC, et al.

*Plaintiffs,*

v.

Rob Bonta, et al.,

*Defendants.*

Case No. 2:24-cv-02787-JAM-CKD

Rumble Inc., et al.

*Plaintiffs,*

v.

Rob Bonta, et al.

*Defendants.*

Case No. 2:24-cv-03315-JAM-CKD

1 Before the Court is Plaintiffs Christopher Kohls, The Babylon Bee, LLC,  
2 Kelly Chang Rickert, Rumble Inc., Rumble Canada Inc., and Defendants Rob Bonta  
3 and Shirley N. Weber’s joint stipulation to consolidate *Kohls v. Bonta*, No. 2:24-cv-  
4 02527-JAM-CKD, with *Rumble, Inc. v. Bonta*, No. 2:24-cv-03315-JAM-CKD. Good  
5 cause appearing, the Court makes the following orders:

6 1. Pursuant to Fed. R. Civ. P. 42, the actions denominated as *Kohls v.*  
7 *Bonta*, Case No. 2:24-cv-02527-JAM-CKD and *Rumble, Inc. v. Bonta*, Case No. 2:24-  
8 cv-03315-JAM-CKD are hereby **CONSOLIDATED** for all purposes;

9 2. Case No. 2:24-cv-02527-JAM-CKD is designated as the “master file;”

10 3. The Clerk of the Court is **DIRECTED** to add all complaints and  
11 answers filed in Case No. 2:24-cv-03315-JAM-CKD to the master file;

12 4. The Clerk of the Court is **DIRECTED** to **ADMINISTRATIVELY**  
13 **CLOSE** Case No. 2:24-cv-03315-JAM-CKD; and

14 5. The parties are **DIRECTED** to file all future pleadings, motions, and  
15 other filings **ONLY** in Case No. 2:24-cv-02527-JAM-CKD.

16 It is so ORDERED.

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19 Dated: December 19, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 19th day of December, 2024.

*s/ Johannes Widmalm-Delphonse*  
Johannes Widmalm-Delphonse  
Counsel for Plaintiffs The Babylon  
Bee, LLC and Kelly Chang Rickert

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