

The DiGuiseppe Law Firm, P.C.  
Raymond M. DiGuiseppe  
CA State Bar No. 228457  
4320 Southport-Supply Road  
Suite 300  
Southport, NC 28461  
P: 910-713-8804  
E: [law.rmd@gmail.com](mailto:law.rmd@gmail.com)

Michael P. Sousa  
Law Offices of Michael P. Sousa, APC  
3232 Governor Dr., Suite A  
San Diego, CA 92122  
T: 858-453-6122  
E: [msousa@msousalaw.com](mailto:msousa@msousalaw.com)

William Sack  
Firearms Policy Coalition  
5550 Painted Mirage Road, Suite 320  
Las Vegas, NV 89149  
*Appearing Pro Hac Vice*  
*Attorneys for Plaintiffs*

Rob Bonta  
Attorney General of California  
Anthony R. Hakl  
Supervising Deputy Attorney General  
Rita B. Bosworth  
Deputy Attorney General  
CA State Bar No. 234964  
455 Golden Gate Avenue, Ste 11000  
San Francisco, CA 94102  
P: 415-510-3592  
E: [Rita.Bosworth@doj.ca.gov](mailto:Rita.Bosworth@doj.ca.gov)  
*Attorneys for Defendants*

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

**LANA RAE RENNA, et al.,  
Plaintiffs,  
vs.**

**ROB BONTA, et al.,  
Defendants.**

Case No.: 20-cv-2190-DMS-DEB

**JOINT STIPULATION AND  
MOTION TO VACATE  
SCHEDULING ORDER**

The parties hereby make this joint stipulation and motion to vacate the pretrial Scheduling Order for the reasons that follow:

1 On June 23, 2022, the United States Supreme Court issued its opinion in *New*  
 2 *York State Rifle & Pistol Association, Inc. v. Bruen*, \_\_ U.S. \_\_, 142 S.Ct. 2111  
 3 (2022), and significantly changed the legal landscape in Second Amendment cases  
 4 by establishing a new framework for analyzing Second Amendment claims.

5 *Bruen* is already impacting other cases involving Second Amendment claims.  
 6 See e.g., *McDougall v. Ventura County*, Ninth Circuit case no. 20-56220 (reversing  
 7 and remanding for further proceedings consistent with *Bruen*); *Martinez v.*  
 8 *Villanueva*, Ninth Circuit case no. 20-56233 (same); *Nguyen v. Bonta*, case no. 3:20-  
 9 cv-02470-WQH-MDD (ordering supplemental briefing and inviting submission of  
 10 supplemental evidence on pending cross-motions for summary judgment, so as to  
 11 address the proper resolution of the claims in light of *Bruen*'s impact on the analysis).

12 It is also expected that *Bruen* will significantly impact the manner in which  
 13 the Second Amendment claims are resolved here. Accordingly, the parties stipulate  
 14 and agree that the current Scheduling Order (ECF No. 30; ECF No. 32) be vacated,  
 15 and they respectfully request the Court's consent to do so for good cause under FRCP  
 16 rule 16(b)(4).

17 The parties further stipulate and agree that Plaintiffs will file a second-  
 18 amended complaint on or before August 22, 2022, with the case to thereafter proceed  
 19 in accordance with the process and timelines set forth in the applicable rules.

20 A new scheduling order and any other matters related to the process ahead can  
 21 be discussed and resolved as necessary and appropriate for efficiency at the  
 22 upcoming status conference currently scheduled for July 29, 2022.

23 Dated: July 19, 2022

Respectfully submitted,

24  
 25 /s/**Raymond M. DiGuiseppe**  
 26 The DiGuiseppe Law Firm, P.C.  
 27 Raymond M. DiGuiseppe  
 28 CA State Bar No. 228457  
 4320 Southport-Supply Road  
 Suite 300

Southport, NC 28461  
P: 910-713-8804  
E: law.rmd@gmail.com

Dated: July 19, 2022

/s/Rita Bosworth  
Deputy Attorney General  
CA State Bar No. 234964  
455 Golden Gate Avenue, Ste. 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 510-3592  
Email: Rita.Bosworth@doj.ca.gov

### CERTIFICATION

I certify that I have obtained authorization to affix to this document the electronic signatures of the above-listed signatories, pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual.

DATED: July 19, 2022

/s/ Raymond M. DiGuiseppe  
Raymond M. DiGuiseppe