

1 C.D. Michel-SBN 144258
Anna M. Barvir-SBN 268728
2 Tiffany D. Chevront-SBN 317144
MICHEL & ASSOCIATES, P.C.
3 180 East Ocean Blvd., Suite 200
Long Beach, CA 90802
4 Telephone: (562) 216-4444
Fax: (562) 216-4445
5 Email: cmichel@michellawyers.com

6 Attorneys for Plaintiffs Junior Sports Magazines Incorporated, Raymond Brown,
California Youth Shooting Sports Association, Redlands California Youth Clay
7 Shooting Sports Inc., California Rifle & Pistol Association, Inc., The CRPA
Foundation, and Gun Owners of California

8 Donald Kilmer-SBN 179986
9 Law Offices of Donald Kilmer, APC
14085 Silver Ridge Road
10 Caldwell, Idaho 83607
Telephone: (408) 264-8489
11 Email: Don@DKLawOffice.com

12 Attorney for Plaintiff Second Amendment Foundation

13 IN THE UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA

15 JUNIOR SPORTS MAGAZINES
INC., RAYMOND BROWN;
16 CALIFORNIA YOUTH SHOOTING
SPORTS ASSOCIATION;
17 REDLANDS CALIFORNIA YOUTH
CLAY SHOOTING SPORTS INC.;
18 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
19 THE CRPA FOUNDATION; GUN
OWNERS OF CALIFORNIA; and
20 SECOND AMENDMENT
FOUNDATION,

21 Plaintiffs,

22 v.

23 ROB BONTA, in his official capacity
24 as Attorney General of the State of
California; and DOES 1-10,

25 Defendants.
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CASE NO: 2:22-cv-04663-CAS (JCx)

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: August 22, 2022
Hearing Time: 10:00 a.m.
Courtroom: 8D
Judge: Christina A. Snyder

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Notice is hereby given that on August 22, 2022, at 10:00 a.m. in Courtroom
3 8D of the above-captioned court, located at First Street Courthouse, 350 W. First
4 Street, Los Angeles, California 90012, Plaintiffs Junior Sports Magazines
5 Incorporated, Raymond Brown, California Youth Shooting Sports Association,
6 Redlands California Youth Clay Shooting Sports Inc., California Rifle & Pistol
7 Association, Inc., The CRPA Foundation, Gun Owners of California, and the
8 Second Amendment Foundation (collectively, “Plaintiffs”) will move for a
9 preliminary injunction under Rule 65(a) of the Federal Rules of Civil Procedure.
10 Specifically, Plaintiffs will seek an order temporarily enjoining Defendant Attorney
11 General Rob Bonta, employees, agents, successors in office, and all District
12 Attorneys, County Counsel, and City Attorneys holding office in the state of
13 California, as well as their successors in office, from Business & Professions Code
14 section 22949.80 during the pendency of this action.

15 Plaintiffs have simultaneously filed, and the Court will soon consider,
16 Plaintiffs’ Ex Parte Application for an Order Shortening Time to Hear Plaintiffs’
17 Motion for Preliminary Injunction, which seeks an order that this motion be heard
18 on August 8, 2022, at 10:00 a.m. in the above-entitled court. Barvir Decl. ¶ 3. The
19 Court has not yet ruled on Plaintiffs’ request, and counsel for Defendant Bonta has
20 stated that he would oppose that request. *Id.*

21 Plaintiffs bring this motion because section 22949.80 violates Plaintiffs’
22 rights to free speech, association, and assembly protected by the First Amendment,
23 as well as their rights to equal protection under the law protected by the Fourteenth
24 Amendment. Unless this Court orders the requested preliminary relief, Plaintiffs will
25 continue to suffer actual and substantial irreparable harm as described in the
26 memorandum of points and authorities filed simultaneously herewith.

27 This application is made on the grounds set forth in the accompanying
28 memorandum of points and authorities, the signed declarations of Anna M. Barvir,

1 Raymond Brown, Anna Canon, Jon Coleman, Andy Fink, Steve Gomez, Alan
2 Gottlieb, Kent Kappen, Richard Minnich, Sam Paredes, Allison Rangel, and Rick
3 Ryan, and all exhibits attached thereto, all pleadings and papers filed in this action,
4 the argument of counsel, and further evidence as the Court may consider at or before
5 a hearing on this Application or the hearing on the Order to Show Cause and
6 preliminary injunction requested herein.

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Dated: July 19, 2022

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir
Counsel for Plaintiffs Junior Sports Magazines
Incorporated, Raymond Brown, California
Youth Shooting Sports Association, Inc.,
Redlands California Youth Clay Shooting
Sports Inc., California Rifle & Pistol
Association, Inc., The CRPA Foundation, and
Gun Owners of California

Dated: July 19, 2022

LAW OFFICES OF DONALD KILMER, APC

s/ Donald Kilmer

Donald Kilmer
Counsel for Plaintiff Second Amendment
Foundation

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Junior Sports Magazines, Inc., et al. v. Bonta*
Case No.: 2:22-cv-04663-CAS (JCx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**PLAINTIFFS’ NOTICE OF MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Kevin J. Kelly, Deputy Attorney General
kevin.kelly@doj.ca.gov
300 South Spring Street, Suite 9012
Los Angeles, CA 90013
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 20, 2022.



Laura Palmerin