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8 capacity as California Attorney General, and  
Blake Graham, in his official capacity as  
9 Acting Director of the Department of Justice  
Bureau of Firearms

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
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15 **LANA RAE RENNA et al.,**

16 Plaintiffs,

17 v.

18 **ROB BONTA, in his official capacity**  
19 **as Attorney General of California;**  
20 **and BLAKE GRAHAM, in his official**  
21 **capacity as Acting Director of the**  
**Department of Justice Bureau of**  
**Firearms,**

22 Defendants.  
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3:20-cv-02190-DMS-DEB

**JOINT MOTION AND  
STIPULATION REGARDING  
PLAINTIFFS' CLAIMS  
CHALLENGING SENATE BILL  
1327**

Judge: The Honorable Dana  
M. Sabraw  
Trial Date: None set  
Action Filed: 11/10/2020

**JOINT MOTION**

Plaintiffs and Defendants respectfully submit this Joint Motion in accordance with Local Civil Rule 7.2. Plaintiffs and Defendants have entered into the stipulation below regarding Plaintiffs' fourth through seventh claims in the Second Amended Complaint, which challenge the constitutionality of section 2 of Senate Bill 1327, codified in California Code of Procedure section 1021.11. The parties respectfully ask the Court to approve the stipulation so that, in accordance with Local Rules, the stipulation is binding on the Court. *See* L. Civ. R. 7.2(a), (b).

Dated: September 28, 2022

Respectfully submitted,

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

/s/ Gabrielle D. Boutin  
GABRIELLE D. BOUTIN  
Deputy Attorneys General  
*Attorneys for Defendants Rob Bonta, in his official capacity as California Attorney General, and Blake Graham, in his official capacity as Acting Director of the Department of Justice Bureau of Firearms*

Dated: September 28, 2022

Respectfully submitted,

/s/ Raymond M. DiGuiseppe  
The DiGuiseppe Law Firm, P.C.  
Raymond M. DiGuiseppe  
CA State Bar No. 228457  
4320 Southport-Supply Road  
Suite 300  
Southport, NC 28461

**STIPULATION**

Plaintiffs and Defendants stipulate as follows:

WHEREAS, Plaintiffs filed their Second Amendment Complaint for Declaratory and Injunction Relief, ECF No. 49 (“SAC”), in this action on August 22, 2022;

WHEREAS, the fourth through seventh claims in the SAC challenge the constitutionality of section 2 of Senate Bill 1327, codified in California Code of Procedure section 1021.11 (“Section 1021.11”);

NOW THEREFORE,

1. Defendants agree that they will not seek to recover attorneys’ fees or costs against any of the Plaintiffs, any of their attorneys, or any of their attorney’s law firms pursuant to Section 1021.11 in connection with this action. This stipulation does not affect Defendants’ rights to seek to recover attorneys’ fees or costs pursuant to any other legal authority. This stipulation also does not affect Defendants’ rights to seek to recover attorneys’ fees and costs incurred in any other lawsuit.

2. All Plaintiffs agree to promptly dismiss the fourth through seventh claims in the SAC. Plaintiffs Renna, Jaymes, Laura Schwartz, Michael Schwartz, Macomber, Freeman, Klier, Smith, Phillips, Cheryl Prince, Darin Prince, Ryan Peterson, and Leonard Ruebe agree to dismiss the fourth through seventh claims with prejudice. The remaining Plaintiffs may dismiss the fourth through seventh claims without prejudice.

IT IS SO STIPULATED.

1 Dated: September 28, 2022

Respectfully submitted,

2 ROB BONTA  
3 Attorney General of California  
4 ANTHONY R. HAKL  
5 Supervising Deputy Attorney General

6 /s/ Gabrielle D. Boutin  
7 GABRIELLE D. BOUTIN  
8 Deputy Attorneys General  
9 *Attorneys for Defendants Rob Bonta,*  
10 *in his official capacity as California*  
11 *Attorney General, and Blake*  
12 *Graham, in his official capacity as*  
13 *Acting Director of the Department of*  
14 *Justice Bureau of Firearms*

15 Dated: September 28, 2022

Respectfully submitted,

16 /s/ Raymond M. DiGuiseppe  
17 The DiGuiseppe Law Firm, P.C.  
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**SIGNATURE CERTIFICATION**

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

DATED: September 28, 2022

/s/ Gabrielle D. Boutin  
Gabrielle D. Boutin

## CERTIFICATE OF SERVICE

Case Name: **Lana Rae Renna et al. v. Xavier** No. **3:20-cv-02190-DMS-DEB**  
**Becerra et al.**

I hereby certify that on September 28, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**JOINT MOTION AND STIPULATION REGARDING PLAINTIFFS' CLAIMS  
CHALLENGING SENATE BILL 1327**

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 September 28, 2022, at Sacramento, California.

\_\_\_\_\_  
Ritta Mashriqi  
Declarant

\_\_\_\_\_  
*/s/Ritta Mashriqi*  
Signature

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