

BENBROOK LAW GROUP, PC
BRADLEY A. BENBROOK (SBN 177786)
STEPHEN M. DUVERNAY (SBN 250957)
701 University Avenue, Suite 106
Sacramento, CA 95825
Telephone: (916) 447-4900
brad@benbrooklawgroup.com
steve@benbrooklawgroup.com

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Attorneys for Plaintiffs

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

Lana Rae Renna; Danielle Jaymes; Laura Schwartz; Michael Schwartz; Robert Macomber; Clint Freeman; John Klier; Justin Smith; John Phillips; Cheryl Prince; Darin Prince; Ryan Peterson; PWGG, L.P.; North County Shooting Center, Inc.; Gunfighter Tactical, LLC; Firearms Policy Coalition, Inc.; San Diego County Gun Owners PAC; Citizens Committee for the Right to Keep and Bear Arms; and Second Amendment Foundation,

Plaintiffs,

v.

Robert Bonta, Attorney General of California; and Allison Mendoza, Director of the California Department of Justice Bureau of Firearms,

Defendants.

Case No.: 3:20-cv-2190-DMS-DEB

NOTICE OF RELATED CASE

1 TO THE COURT, CLERK OF THE COURT, AND TO ALL PARTIES IN THE
2 RELATED CASES REFERENCED BELOW:

3 PLEASE TAKE NOTICE that, pursuant to S.D. CivLR 40.1.f, Plaintiffs hereby
4 serve this Notice of Related Case to show that this action is related to another action
5 within this District, namely *Danielle Jaymes, et al. v. Bonta*, filed October 13, 2025.
6 The case number has not yet been assigned at the time of this filing.

7 *Jaymes v. Bonta* is related to this action under CivLR 40.1.e.1, 2, 4, and 6:

8 ***The Cases Arise From Substantially Identical Happenings Or Events.*** The
9 *Jaymes* Plaintiffs challenge the constitutionality of California Penal Code § 27595(a),
10 which bans the sale or transfer of certain handgun models—including all Glock and
11 Glock-style handguns—that are among the most popular firearms in the nation. Yet if
12 § 27595(a) is enforced, Californians will have no practical way to acquire them.
13 Therefore, the *Jaymes* Plaintiffs allege, § 27595(a) violates the Second Amendment.

14 California’s effort to ban *all* Glock handguns through § 27595(a) expands the
15 ban already imposed through enforcement of the State’s handgun roster that Plaintiffs
16 challenge in this case. This Court has held that these restrictions are likely
17 unconstitutional because these handguns are “in common use.” *Renna v. Bonta*, 667
18 F. Supp. 3d 1048, 1063 (S.D. Cal. 2023) (discussing the Glock 43 and Glock 17 Gen
19 5, among other handgun models).

20 ***The Cases Involve Overlapping Parties.*** Five of the six Plaintiffs in *Jaymes* are
21 Plaintiffs here (Danielle Jaymes; John Phillips; PWGG, L.P.; Firearms Policy
22 Coalition, Inc.; and Second Amendment Foundation). Attorney General Rob Bonta
23 (the lead Defendant here) is the only Defendant in *Jaymes*.

24 ***The Cases Require The Determination Of Substantially Identical Questions***
25 ***Of Law.*** Just as in this case, the Plaintiffs in *Jaymes* bring a Second Amendment
26 challenge to California’s effort to ban handguns that are in common use for lawful
27 purposes for self-defense. Resolving the constitutionality of California’s effort to
28 *expand* its ban on “popular handguns designed for self-defense,” *Renna*, 667 F. Supp.

1 3d at 1069, through § 27595(a) requires the determination of the identical legal
2 question presented here.

3 **Substantial Duplication Of Work Would Be Inevitable If Different Judges**
4 **Were Assigned To *Renna And Jaymes*.** Because the two cases raise an identical legal
5 question, the assignment of *Jaymes* and this action to a single district judge will
6 promote judicial economy by preserving labor and ensure that the cases reach
7 consistent results.

8 Pursuant to CivLR 40.1.h, the Clerk of the Court is therefore requested to report
9 the related cases to “the judges concerned at the earliest date practicable.”

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Dated: October 13, 2025

BENBROOK LAW GROUP, PC

By Bradley A. Benbrook
BRADLEY A. BENBROOK
Attorneys for Plaintiffs