

1 KAMALA D. HARRIS  
 Attorney General of California  
 2 TAMAR PACHTER  
 Supervising Deputy Attorney General  
 3 ROSS C. MOODY  
 Deputy Attorney General  
 4 State Bar No. 142541  
 455 Golden Gate Avenue, Suite 11000  
 5 San Francisco, CA 94102-7004  
 Telephone: (415) 703-1376  
 6 Fax: (415) 703-1234  
 E-mail: Ross.Moody@doj.ca.gov  
 7 *Attorneys for Defendants Kamala Harris and*  
*California Department of Justice*  
 8

9 IN THE UNITED STATES DISTRICT COURT  
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

13 **BRENDAN JOHN RICHARDS, THE**  
 14 **CALGUNS FOUNDATION, INC., and THE**  
 15 **SECOND AMENDMENT FOUNDATION,**  
 16 **INC.,**

Plaintiffs,

v.

17 **KAMALA HARRIS, Attorney General of**  
 18 **California (in her official capacity),**  
 19 **CALIFORNIA DEPARTMENT OF**  
 20 **JUSTICE, CITY OF ROHNERT PARK,**  
 21 **OFFICER DEAN BECKER (RP134) and**  
 22 **DOES 1 TO 20,**

Defendants.

CV 11-2493 SI and CV-10-1255 SI

**STIPULATION AND ORDER FOR**  
**ADDITIONAL TIME TO PLEAD TO**  
**CONSOLIDATED AMENDED**  
**COMPLAINT**

Courtroom:  
 Judge The Honorable Susan Illston  
 Trial Date: N/A  
 Action Filed:

23  
 24 On October 22, 2011 the Court issued an order granting the rule 12(b)(6) motion filed by  
 25 defendants Kamala Harris and the California Department of Justice in the consolidated cases of  
 26 *Haynie, et al. v. Harris, et al.* (CV-10-1255 SI) and *Richards, et al. v. Harris, et al.* (CV-11-  
 27 2493). The order directed Plaintiffs to file a Consolidated Amended Complaint no later than  
 28 November 4, 2011, and, as directed, Plaintiffs filed and served such an amended complaint on

1 November 4, 2011. In addition, Plaintiffs recently filed a new federal action related both to the  
2 second arrest of Brendan Richards and the underlying dispute about California's Assault  
3 Weapons Control Act, and service of that action on Defendants Kamala Harris and the California  
4 Department of Justice is expected to occur next week.

5 Pursuant to Federal Rule of Federal Procedure, Rule 15(a)(3), an answer or other  
6 responsive pleading shall be filed within 14 days after service of an amended pleading. The  
7 parties wish to stipulate to extend the date by which all defendants must answer or otherwise  
8 plead to the Consolidated Amended Complaint by 35 days. Therefore, pursuant to this  
9 stipulation, Defendants Kamala Harris, the California Department of Justice, the City of Rohnert  
10 Park and Officer Dean Becker shall have until December 26, 2011 to answer or plead to the  
11 Consolidate Amended Complaint filed in CV 11-2493 SI and CV-10-1255 SI.

12 IT IS SO STIPULATED.

13 Dated: November 18, 2011

/s/ Ross C. Moody  
ROSS C. MOODY  
Deputy Attorney General  
*Attorneys for Defendants Kamala Harris and  
California Department of Justice*

16 Dated: November 18, 2011

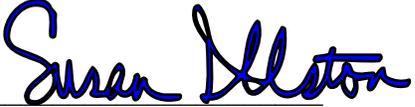
/s/ Robert W. Henkels  
ROBERT W. HENKELS  
Geary, Shea, O'Donnell, Grattan & Mitchell, P.C.  
*Attorneys For Defendants City Of Rohnert Park  
And Officer Dean Becker*

20 Dated: November 18, 2011

/s/ Don E.J. Kilmer, Jr.  
DON E.J. KILMER, JR.  
Law Offices of Don Kilmer, A.P.C.  
*Attorneys for Plaintiffs Richard Haynie, Brendan  
John Richards, The Calguns Foundation, Inc.,  
and The Second Amendment Foundation, Inc.*

24 Good Cause appearing, IT IS SO ORDERED.

25 Dated: 11/22/11

  
The Honorable Susan Illston  
United States District Judge

28 SA2011101441  
20559296.doc