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7 *Attorneys for Plaintiff*

8  
9 UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11  
12 DEFENSE DISTRIBUTED, a Texas  
corporation,

13 Plaintiff,

14 v.

15 ROBERT BONTA, in his official  
16 capacity as California Attorney General;  
ALLISON MENDOZA, in her official  
17 capacity as Acting Director of the  
California Bureau of Firearms,  
18

19 Defendants.

Case No. 2:22-cv-06200-GW-AGR

**Stipulation re: Dismissal of Action  
with Prejudice and Waiver and  
Release of Claims**

20  
21 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**  
22 **RECORD:**

23  
24 **PLEASE TAKE NOTICE** that Plaintiff Defense Distributed (“Plaintiff”)  
25 and Defendants Rob Bonta, in his official capacity as Attorney General of the State  
26 of California, and Alison Mendoza, in her official capacity as Acting Director for  
27 the California Department of Justice Bureau of Firearms, having substituted in for  
28 former Bureau of Firearms Director Luis Lopez pursuant to Rule 25(d) of the

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1 Federal Rules of Civil Procedure (collectively, “Defendants”), hereby stipulate and  
2 agree as follows:

3 1. Plaintiff filed this action for declaratory and injunctive relief on or  
4 about August 31, 2022. Plaintiff filed its first amended complaint for declaratory  
5 and injunctive relief on September 21, 2022 (the “First Amended Complaint”). The  
6 First Amended Complaint alleges its first claim for relief for violation of the  
7 Second Amendment (the “First Claim for Relief”) and its second claim for relief for  
8 violation of the First Amendment (the “Second Claim for Relief”).

9 2. Defendants timely answered the First Amended Complaint on October  
10 21, 2022.


11 3. The parties now agree that the First Amended Complaint should be  
12 dismissed in exchange for a waiver of fees and costs, and that Defendants should  
13 waive and release any and all claims they may have under California law against  
14 Plaintiff, its principals, agents and attorneys, arising out of Code of Civil Procedure  
15 section 1021.11 that could have been brought with respect to the First Amended  
16 Complaint.

17 4. Accordingly, the parties agree to the dismissal with prejudice of  
18 Plaintiff’s First Claim for Relief and to the dismissal without prejudice of the  
19 Second Claim for Relief.

20  
21 Dated: November 18, 2022

SNELL & WILMER LLP

22  
23 By:

  
\_\_\_\_\_  
Michael B. Reynolds  
Cameron J. Schlagel  
Attorneys for Plaintiff  
Defense Distributed

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Dated: November 18, 2022

ROB BONTA  
Attorney General of California  
R. Matthew Wise  
Supervising Deputy Attorney General


By:           /s/ S. Clinton Woods            
S. Clinton Woods  
Deputy Attorney General  
Attorneys for Rob Bonta, in his  
official capacity as California Attorney  
General, and Allison Mendoza, in her  
official capacity as Acting Director of  
the Department of Justice Bureau of  
Firearms

**SIGNATURE CERTIFICATION (Local Rule 5-4.3.4)**

I, Michael B. Reynolds, certify that all signatories listed above, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

Date: November 18, 2022

SNELL & WILMER, LLP

By:                       
Michael B. Reynolds  
Cameron J. Schlagel  
Attorneys for Plaintiff  
Defense Distributed

4878-4219-0911

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