

1 RYAN CHABOT (pro hac vice)
ryan.chabot@wilmerhale.com
2 WILMER CUTLER PICKERING
HALE AND DORR LLP
3 7 World Trade Center,
250 Greenwich Street
4 New York, NY 10007
Telephone: (212) 295-6513
5 Facsimile: (212) 230-8888

6 *Attorney for Defendants Los Angeles County
Sheriff's Department and Sheriff Robert Luna*

7 *(additional counsel listed below)*

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 CALIFORNIA RIFLE & PISTOL
12 ASSOCIATION, INCORPORATED; et
13 al.,

14 Plaintiffs,

15 v.

16 LOS ANGELES COUNTY SHERIFF'S
17 DEPARTMENT; et al.,

18 Defendants.

Case No. 2:23-cv-10169-SPG-ADS

**NOTICE OF TENTATIVE
SETTLEMENT**

Judge: Hon. Sherilyn Peace Garnett
Action Filed: December 4, 2023

19
20
21
22
23
24
25
26
27
28
NOTICE OF TENTATIVE SETTLEMENT

Cal. Rifle & Pistol Ass'n v. Los Angeles County Sheriff's Dep't, No. 2:23-cv-10169

1 MARK SELWYN (CA Bar No. 244180)
mark.selwyn@wilmerhale.com
2 WILMER CUTLER PICKERING
HALE AND DORR LLP
3 2600 El Camino Road
Palo Alto, California 94306
4 Telephone: (650) 858-6031
Facsimile: (650) 858-6100

5 JOSHUA VITTOR (CA Bar No. 326221)
joshua.vittor@wilmerhale.com
6 SIMON KRESS (CA Bar No. 360898)
simon.kress@wilmerhale.com
7 WILMER CUTLER PICKERING
8 HALE AND DORR LLP
350 South Grand Ave., Suite 2400
9 Los Angeles, CA 90071
Telephone: (213) 443-5300
10 Fax: (213) 443-5400

11 *Attorneys for Defendants Los Angeles County*
12 *Sheriff's Department and Sheriff Robert Luna*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOTICE OF TENTATIVE SETTLEMENT

Cal. Rifle & Pistol Ass'n v. Los Angeles County Sheriff's Dep't, No. 2:23-cv-10169

1 Defendants Los Angeles County Sherriff’s Department and Sheriff Robert
2 Luna (“Defendants”) hereby file this Notice of Tentative Settlement between the
3 Defendants and Plaintiffs California Rifle & Pistol Association, Incorporated; The
4 Second Amendment Foundation; Gun Owners of America, Inc.; Gun Owners
5 Foundation; Gun Owners of California, Inc.; Charles Messel; Brian Weimer; Jung
6 Yun; Albert Medalla; Zhao Lin Chen; Eric Stratton; and Farzad Nezam. The parties
7 have agreed in principle on the terms of a settlement that would resolve all remaining
8 claims against Defendants in exchange for payment of a negotiated fee amount and
9 an agreed-upon schedule for Defendants’ compliance with Senate Bill 2’s 120-day
10 CCW application processing deadline (California Penal Code section 26205(a)).
11 Once the parties formalize and agree to all terms of settlement, they will file a notice
12 with the Court.

13
14
15 Dated: October 31, 2025

Respectfully submitted,

16 /s/ Ryan Chabot

17 RYAN CHABOT (*pro hac vice*)
18 ryan.chabot@wilmerhale.com
19 WILMER CUTLER PICKERING
20 HALE AND DORR LLP
21 7 World Trade Center
22 250 Greenwich Street
23 New York, NY 10007
24 Telephone: (212) 295-6513
25 Facsimile: (212) 230-8888

26 MARK SELWYN (CA Bar No. 244180)
27 mark.selwyn@wilmerhale.com
28 WILMER CUTLER PICKERING
HALE AND DORR LLP
2600 El Camino Road
Palo Alto, California 94306

1 Telephone: (650) 858-6031
2 Facsimile: (650) 858-6100

3 JOSHUA VITTOR (CA Bar No. 326221)
4 joshua.vittor@wilmerhale.com
5 SIMON KRESS (CA Bar No. 360898)
6 simon.kress@wilmerhale.com
7 WILMER CUTLER PICKERING
8 HALE AND DORR LLP
9 350 South Grand Ave., Suite 2400
10 Los Angeles, CA 90071
11 Telephone: (213) 443-5300
12 Fax: (213) 443-5400

13 *Attorneys for Defendants Los Angeles County*
14 *Sheriff's Department and Sheriff Robert Luna*