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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.

17 STATE OF CALIFORNIA and
18 ROBERT BONTA, in his official
19 capacity as head of the California
20 Department of Justice,
21 Defendants.

Case No. 8:2026-cv-1697-MRA-ADS

**PLAINTIFF'S SECOND NOTICE
OF SUPPLEMENTAL
AUTHORITY**

Hearing: September 11, 2026
Hearing Time: 10:00 a.m.
Courtroom: 9B

Hon. Mónica Ramírez Almadani
United States District Judge

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1 Plaintiff United States of America submits this Second Notice of
2 Supplemental Authority to alert the Court to a recent Order in *Glock, Inc. v. Patrick*
3 *J. Griffin et al.*, case no. 3:26-cv-01525-KAD (D. Conn. Sept. 30, 2026), attached
4 hereto as Exhibit A.

5 This decision is relevant to the pending Motion for Preliminary Injunction by
6 Plaintiff in this case as it demonstrates that a sister federal district court has
7 reviewed and granted a motion for preliminary injunction to enjoin the enforcement
8 of a statute that bans the sale of handguns with cruciform trigger bars (commonly
9 known as Glock bans). The court first analyzed whether the plaintiffs would be
10 likely to succeed on the merits of their claims, and concluded that they would
11 because Glock bans are presumptively unconstitutional under *Bruen* step one and
12 there was no historical analogue to rebut that presumption. Exhibit A at 7–10. The
13 court then analyzed whether the plaintiffs would be likely to suffer irreparable harm
14 in the absence of preliminary relief and concluded that they would. *Id.* at 10–11.

15 Respectfully submitted this 30th day of September 2026.

16
17 /s/ Patrick Todd
18 Patrick Todd
19 Trial Attorney
20 Second Amendment Section
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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for the United States, certifies that this brief contains 183 words, which complies with the word limit of L.R. 11-6.1.

Dated: September 30, 2026

Respectfully submitted,

/s/ Patrick Todd

PATRICK TODD

Trial Attorney

Second Amendment Section