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

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF CALIFORNIA and
ROBERT BONTA, in his official
capacity as head of the California
Department of Justice,

Defendants.

Case No. 8:2026-cv-1697

***EX PARTE* APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT
ISSUE**

Hearing: None set

Judge: None appointed

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23 UNITED STATES OF AMERICA
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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and Local Rule
3 7- 19, Plaintiff in the above-captioned matter, hereby apply *ex parte* to this Court
4 for a temporary restraining order (“TRO”) and for issuance of an order to show
5 cause why a preliminary injunction should not issue. This *ex parte* application is
6 based upon this Application, the accompanying Memorandum of Points and
7 Authorities, the concurrently filed Declarations of Earl Griffith and Tristan Silva II,
8 and all papers on file in this action, and any oral argument of counsel the Court may
9 hear. The Memorandum of Points and Authorities in support of this Application is
10 filed herewith.
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13 The Plaintiff brings this application on an *ex parte* basis because, as described
14 in the memorandum filed herewith, Cal. Penal Code § 27595(a) (the “Glock Ban”)
15 is a flagrant violation of the Second Amendment and merits immediate enjoinder.
16 Handguns are “*overwhelmingly chosen* by American[s]” for self-defense. *District*
17 *of Columbia v. Heller*, 554 U.S. 570, 628 (2008). Therefore, a “prohibition of their
18 use is invalid.” *Id.* at 629. Glock handguns are the most popular handguns in
19 America. The State’s Glock Ban prohibits citizens from acquiring those handguns
20 from licensed dealers. The threat or actual implementation of the Glock Ban by
21 state law enforcement officials amounts to misconduct depriving citizens of their
22 fundamentally protected rights.
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1 Plaintiff respectfully submits that *ex parte* relief is appropriate given that the
2 facts set forth in the attached memorandum and its supporting papers evidence that
3 immediate and irreparable injury will result to the citizens before opposition can be
4 heard. California Supervising Deputy Attorney General Charlie Sarosy informed
5 Plaintiff's counsel that Defendants oppose the requested relief.
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8 **Statement of Compliance Civil Local Rule 7-19.1 and Rule 65**

9 Pursuant to Civil Local Rule 7-19.1 and Fed. R. Civ. P. 65, counsel for the
10 Plaintiff made extensive good faith efforts to notify Defendants of this Application.
11 These efforts are summarized in the Declaration of Tristan Silva II filed herewith.
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13 Respectfully submitted this 1st day of July 2026.

14 /s/ Barry K. Arrington
15 Barry Arrington
16 Acting Chief
17 Second Amendment Section
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