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20 *and Kelly Chang Rickert*

21 *\*Admitted pro hac vice*

22 **UNITED STATES DISTRICT COURT**  
23 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

24 **The Babylon Bee, LLC, and Kelly**  
25 **Chang Rickert,**

26 *Plaintiffs,*

27 v.

28 **Rob Bonta, et al.,**

*Defendants.*

Civil No. 2:24-cv-02787-JAM-CKD

**Stipulation re Kohls Preliminary  
Injunction**

**Judge: John A. Mendez**

STIPULATION

1  
2 1. Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert filed this suit on  
3 September 30, 2024, in the Central District of California, and sought a temporary  
4 restraining order or preliminary injunction to enjoin Defendants California Attorney  
5 General Rob Bonta and Secretary of State Shirley N. Weber from enforcing AB 2839 (Cal.  
6 Elec. Code § 20012) against them. See Pls.’ App. for TRO or Mot. Prelim. Inj., ECF No. 12.

7 2. On October 2, 2024, this Court facially enjoined Defendants from enforcing  
8 AB 2839 in a related case. Order, *Kohls v. Bonta*, No. 24-cv-02527 (E.D. Cal., Oct. 2,  
9 2024), ECF No. 14.

10 3. This case was subsequently transferred to the Eastern District of California  
11 and assigned to this Court. All parties have agreed to consolidate this case with *Kohls v.*  
12 *Bonta* in a separate stipulation filed concurrently with this Court.

13 NOW THEREFORE, the parties hereby STIPULATE that:

14 4. The preliminary injunction ordered on October 2 (*Kohls v. Bonta*, No. 24-cv-  
15 2527, ECF No. 14) applies to Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert  
16 by the order’s plain language.

17  
18 DATED: October 22, 2024

19  
20 s/ Johannes Widmalm-Delphonse  
Johannes Widmalm-Delphonse  
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s/ Kristin A. Liska  
(authorized 10.22.24)

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12 LLC and Kelly Chang Rickert*

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**PROOF OF SERVICE**

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 22nd day of October, 2024.

*s/ Johannes Widmalm-Delphonse*  
Johannes Widmalm-Delphonse  
Counsel for Plaintiffs