

1 ROB BONTA
Attorney General of California
2 MYUNG J. PARK (SBN 210866)
Supervising Deputy Attorney General
3 DAVID ZAFT (SBN 237365)
M. ELAINE MECKENSTOCK (SBN 268861)
4 CAITLAN McLOON (SBN 302798)
EMILY HAJARIZADEH (SBN 325246)
5 DYLAN REDOR (SBN 338136)
KATHERINE GAUMOND (SBN 349453)
6 Deputy Attorneys General
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013-1230
Telephone: (213) 269-6438
8 Fax: (916) 731-2128
E-mail: Caitlan.McLoon@doj.ca.gov
9 *Attorneys for Defendants Liane M. Randolph,*
Steven S. Cliff, and Robert A. Bonta
10

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 CHAMBER OF COMMERCE OF THE
15 UNITED STATES OF AMERICA,
16 CALIFORNIA CHAMBER OF
COMMERCE, AMERICAN FARM
17 BUREAU FEDERATION, LOS
ANGELES COUNTY BUSINESS
18 FEDERATION, CENTRAL VALLEY
BUSINESS FEDERATION, and
19 WESTERN GROWERS
ASSOCIATION,

20 Plaintiffs,

21 v.

22 LIANE M. RANDOLPH, in her official
capacity as Chair of the California Air
23 Resources Board, and STEVEN S.
CLIFF, in his official capacity as the
24 Executive Officer of the California Air
Resources Board, and ROBERT A.
25 BONTA, in his official capacity as
Attorney General of California,
26

27 Defendants.
28

2:24-cv-00801-ODW-PVC

**Defendants' Answer to Plaintiffs'
Amended Complaint for Declaratory
and Injunctive Relief**

Date: N/A
Time: N/A
Courtroom: 5D
Judge: The Honorable Otis D.
Wright, II
Trial Date: Not Set
Action Filed: 1/30/2024

1 Defendants Liane M Randolph, in her official capacity as Chair of the
2 California Air Resources Board (CARB); Steven S. Cliff, in his official capacity as
3 Executive Officer of the California Air Resources Board; and Rob Bonta, in his
4 official capacity as Attorney General of the State of California (collectively
5 “Defendants”) hereby submit their answer to Plaintiffs’ Amended Complaint for
6 Declaratory and Injunctive Relief (ECF No. 28).¹ All factual allegations not
7 expressly admitted below are denied.

8 1. Paragraph 1 consists of argument and legal conclusions to which no
9 response is required. Paragraph 1 quotes, cites to, and purports to paraphrase
10 Assembly Comm. on Nat’l Res., Analysis of S. B. 261 (2023–2024 Reg. Sess.) July
11 7, 2023. This document speaks for itself and provides the best evidence of its
12 contents. The references in Paragraph 1 to federalism, the Clean Air Act, and
13 interstate commerce are no longer relevant because Plaintiffs’ Supremacy Clause
14 and Extraterritoriality claims were dismissed (ECF No. 77 at 23-24), and Plaintiffs
15 did not amend. To the extent a further response is required, Defendants deny the
16 allegations in Paragraph 1.

17 2. The first four sentences of Paragraph 2 purport to state Plaintiffs’ policy
18 views and are not facts that require a response. Defendants are also without
19 sufficient information to form a belief as to the truth of these allegations, and on
20 that basis deny them. The remainder of paragraph 2 consists of argument and legal
21 conclusions to which no response is required. To the extent a further response is
22 required, Defendants deny the allegations in Paragraph 2.

23 3. Defendants admit that Governor Gavin Newsom signed S. B. 253 and
24 261 into law on October 7, 2023.

25 4. Paragraph 4 consists of argument and legal conclusions to which no
26 response is required. Paragraph 4 also cites and purports to paraphrase S.B. 253 and

27
28 ¹ On February 27, 2025, the Court granted the parties’ stipulated Answer
deadline of March 17, 2025. (ECF No. 81).

1 S.B. 261. These laws speak for themselves and provide the best evidence of their
2 contents. Paragraph 4 further quotes, cites to, and purports to paraphrase a
3 Statement of Sen. Scott Wiener (Sept. 17, 2023), <http://tinyurl.com/27up3ded>.
4 Defendants are without sufficient information to form a belief as to the truth of the
5 characterizations in this document, as the web link refers to a webpage that is
6 currently unavailable, and on that ground, Defendants deny these allegations. In any
7 event, if that webpage were available, the referenced document would speak for
8 itself and provide the best evidence of its contents. Paragraph 4 also quotes, cites to,
9 and purports to paraphrase Sen. Judiciary Comm., Analysis of S.B. 253 (2023–2024
10 Reg. Sess.) Apr. 14, 2023 at 12, and Signing Statement of Gov. Newsom, S.B. 253
11 (Oct. 7, 2023), <http://tinyurl.com/4mz6by3p>. These documents speak for
12 themselves and provide the best evidence of their contents. To the extent a further
13 response is required, Defendants deny the allegations in Paragraph 4.

14 5. Paragraph 5 consists of argument and legal conclusions to which no
15 response is required. To the extent a further response is required, Defendants deny
16 the allegations in Paragraph 5.

17 6. Paragraph 6 consists of argument and legal conclusions to which no
18 response is required. To the extent a further response is required, Defendants deny
19 the allegations in Paragraph 6.

20 7. Paragraph 7 consists of argument and legal conclusions to which no
21 response is required. Moreover, many of these allegations are contradicted by
22 publicly available information, and Defendants deny Plaintiffs' allegations on this
23 ground. Paragraph 7 also quotes, cites to, and purports to paraphrase Assembly
24 Comm. on Nat'l Res., Analysis of SB. 261 (2023–2024 Reg. Sess.) July 7, 2023
25 and Remarks of Assemblymember Rick Chavez Zbur, Debate on S.B. 253 (Sept.
26 11, 2023), <http://tinyurl.com/taajvam8>. These documents speak for themselves and
27 provide the best evidence of their contents. To the extent these allegations are
28 relevant to Plaintiffs' Supremacy Clause and Extraterritoriality claims, those claims

1 were dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response
2 is required. To the extent a further response is required, Defendants deny the
3 allegations in Paragraph 7.

4 8. Paragraph 8 consists of argument and legal conclusions to which no
5 response is required. Plaintiffs' Supremacy Clause and Extraterritoriality claims
6 were dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response
7 as to those allegations is required. To the extent a further response is required,
8 Defendants deny the allegations in Paragraph 8.

9 9. Defendants are without sufficient information to form a belief as to the
10 truth of the allegations in Paragraph 9, and on that basis deny those allegations.

11 10. Defendants are without sufficient information to form a belief as to the
12 truth of the allegations in Paragraph 10, and on that basis deny those allegations.

13 11. Defendants are without sufficient information to form a belief as to the
14 truth of the allegations in the first four sentences of Paragraph 11, and on that basis
15 deny those allegations. The remaining allegations contained in sentences 5 through
16 7 of paragraph 11, consist of argument and legal conclusions to which no response
17 is required. Moreover, many of these allegations are contradicted by publicly
18 available information, and Defendants deny Plaintiffs' allegations on this ground.
19 To the extent a further response is required, Defendants deny the allegations in
20 Paragraph 11.

21 12. Defendants are without sufficient information to form a belief as to the
22 truth of the allegations in Paragraph 12, and on that basis deny those allegations.

23 13. Defendants are without sufficient information to form a belief as to the
24 truth of the allegations in Paragraph 13, and on that basis deny those allegations.

25 14. Defendants are without sufficient information to form a belief as to the
26 truth of the allegations in Paragraph 14, and on that basis deny those allegations.

1 15. Defendants admit that Liane M. Randolph is currently the Chair of the
2 California Air Resources Board (CARB), and that Plaintiffs have sued her only in
3 her official capacity.

4 16. Defendants admit that Steven S. Cliff is currently CARB's Executive
5 Officer, and that Plaintiffs have sued him only in his official capacity.

6 17. Defendants admit that Rob Bonta is the current Attorney General of
7 California and that Plaintiffs have sued him only in his official capacity. The
8 remainder of Paragraph 17 quotes, cites to, and purports to paraphrase Senate Bill
9 253 and the California Constitution. These documents speak for themselves and
10 provide the best evidence of their contents. Moreover, these statements consist of
11 argument and legal conclusions to which no response is required. To the extent a
12 further response is required, Defendants deny these remaining allegations in
13 Paragraph 17.

14 18. Paragraph 18 consists of argument and legal conclusions to which no
15 response is required. To the extent a further response is required, Defendants deny
16 the allegations in Paragraph 18.

17 19. Paragraph 19 consists of argument and legal conclusions to which no
18 response is required. Paragraph 19 also quotes, cites to, and purports to paraphrase
19 *Free Enter. Fund v. Pub. Co. Accounting Oversight Bd.*, 561 U.S. 477, 489 (2010).
20 This case speaks for itself and provides the best evidence of its contents. To the
21 extent a further response is required, Defendants deny the allegations in Paragraph
22 19.

23 20. Paragraph 20 consists of argument and legal conclusions to which no
24 response is required. Paragraph 20 also quotes, cites to, and purports to paraphrase
25 *California Rest. Ass'n v. City of Berkeley*, 89 F.4th 1094 (9th Cir. 2024). This case
26 speaks for itself and provides the best evidence of its contents. Defendants are
27 without sufficient information to form a belief as to the truth of the allegations in
28 the third sentence of Paragraph 11, and on that basis deny those allegations. To the

1 extent a further response is required, Defendants deny the allegations in Paragraph
2 20.

3 21. Paragraph 21 consists of argument and legal conclusions to which no
4 response is required. To the extent further response is required, Defendants deny
5 the allegations of Paragraph 21. Defendants did not contest venue in the Central
6 District of California.

7 22. Paragraph 22 consists of argument and legal conclusions to which no
8 response is required. Defendants are also without sufficient information to form a
9 belief as to the truth of the allegations in lines 14 through 15 of Paragraph 22, and
10 on that basis deny those allegations. To the extent further response is required,
11 Defendants deny the allegations in Paragraph 22. Defendants did not contest venue
12 in the Central District of California.

13 23. Paragraph 23 consists of argument and legal conclusions to which no
14 response is required. Paragraph 23 also quotes, cites to, and purports to paraphrase
15 a Statement of Sen. Scott Wiener (Sept. 17, 2023), <http://tinyurl.com/27up3ded>.
16 Defendants are without sufficient information to form a belief as to the truth of the
17 characterizations in this document, as the web link refers to a webpage that is
18 currently unavailable, and on that ground, Defendants deny these allegations. In any
19 event, if that webpage were available, the referenced document would speak for
20 itself and provide the best evidence of its contents. Paragraph 23 also quotes, cites
21 to, and purports to paraphrase Sen. Judiciary Comm., Analysis of S.B. 253 (2023–
22 2024 Reg. Sess.) Apr. 14, 2023. This document speaks for itself and provides the
23 best evidence of its contents. To the extent a further response is required,
24 Defendants deny the allegations in Paragraph 23.

25 24. Paragraph 24 consists of argument and legal conclusions to which no
26 response is required. Paragraph 24 also quotes, cites to, and purports to paraphrase
27 Sen. Judiciary Comm., Analysis of S.B. 253 (2023–2024 Reg. Sess.) Apr. 14, 2023
28 and Sen. Judiciary Comm., Analysis of S.B. 261 (2023–2024 Reg. Sess.) Apr. 14,

1 2023. These documents speak for themselves and provide the best evidence of their
2 contents. To the extent a further response is required, Defendants deny the
3 allegations in Paragraph 24.

4 25. Paragraph 25 consists of argument and legal conclusions to which no
5 response is required. Paragraph 25 also quotes, cites to, and purports to paraphrase
6 *California Passes First-in-the-Nation Bill to Expand Transparency in California*
7 *Emissions*, SIERRA CLUB CALIFORNIA (Sept. 12, 2023),
8 <http://tinyurl.com/4v8z34fk>, *California Lawmakers Approve Groundbreaking*
9 *Climate Disclosure Bill*, PUBLIC CITIZEN (Sept. 12, 2023),
10 <http://tinyurl.com/36svd2t3>, and *Sacramento Rally to Unite for Climate*
11 *Transparency & Passage of SB 253 & SB 261*, CERES (Aug. 22, 2023),
12 <http://tinyurl.com/wz8tzcac>. These documents speak for themselves and provide the
13 best evidence of their contents. To the extent a further response is required,
14 Defendants deny the allegations in Paragraph 25.

15 26. Paragraph 26 consists of argument and legal conclusions to which no
16 response is required. Paragraph 26 also quotes, cites to, and purports to paraphrase
17 Senate Bills 253 and 261. The Senate Bills speak for themselves and provide the
18 best evidence of their contents. To the extent a further response is required,
19 Defendants deny the allegations in Paragraph 26.

20 27. Paragraph 27 consists of argument and legal conclusions to which no
21 response is required. Paragraph 27 also quotes, cites to, and purports to paraphrase
22 Sen. Judiciary Comm., Analysis of S.B. 253 (2023–2024 Reg. Sess.) Apr. 14, 2023.
23 This document speaks for itself and provides the best evidence of its contents. To
24 the extent a further response is required, Defendants deny the allegations in
25 Paragraph 27.

26 28. Paragraph 28 consists of argument and legal conclusions to which no
27 response is required. Paragraph 28 also quotes, cites to, and purports to paraphrase
28 Sen. Judiciary Comm., Analysis of S.B. 253 (2023–2024 Reg. Sess.) Apr. 14, 2023

1 and Remarks of Sen. Wiener, Sen. Env'l Quality Comm. Hearing on S.B. 253 (Mar.
2 25, 2023) <http://tinyurl.com/yf66mbdn>. These documents speak for themselves and
3 provide the best evidence of their contents. To the extent a further response is
4 required, Defendants deny the allegations in Paragraph 28.

5 29. Defendants are without sufficient information to form a belief as to the
6 truth of the allegations in Paragraph 29, and on that basis deny those allegations. To
7 the extent a further response is required, Defendants deny the allegations in
8 Paragraph 29.

9 30. Paragraph 30 quotes, cites to, and purports to paraphrase Sen. Judiciary
10 Comm., Analysis of S.B. 253 (2023–2024 Reg. Sess.) Apr. 14, 2023. This
11 document speaks for itself and provides the best evidence of its contents. To the
12 extent a further response is required, Defendants deny the allegations in Paragraph
13 30.

14 31. Paragraph 31 consists of argument and legal conclusions to which no
15 response is required. Paragraph 31 also quotes, cites to, and purports to paraphrase
16 Sen. Judiciary Comm., Analysis of S.B. 253 (2023–2024 Reg. Sess.) Apr. 14, 2023.
17 This document speaks for itself and provides the best evidence of its contents. To
18 the extent a further response is required, Defendants deny the allegations in
19 Paragraph 31.

20 32. Paragraph 32 consists of argument and legal conclusions to which no
21 response is required. Paragraph 32 also quotes, cites to, and purports to paraphrase
22 Signing Statement of Gov. Newsom, S.B. 253 (Oct. 7, 2023),
23 <http://tinyurl.com/4mz6by3p> and Signing Statement of Gov. Newsom, S.B. 261
24 (Oct. 7, 2023), <http://tinyurl.com/ycy7vk2w>. These documents speak for
25 themselves and provide the best evidence of their contents. To the extent a further
26 response is required, Defendants deny the allegations in Paragraph 32.

1 33. Paragraph 33 consists of argument and legal conclusions to which no
2 response is required. To the extent a further response is required, Defendants deny
3 the allegations in Paragraph 33.

4 34. Paragraph 34 consists of argument and legal conclusions to which no
5 response is required. Paragraph 34 also quotes, cites to, and purports to paraphrase
6 Sen. Rules Comm., Analysis of S.B. 261 (2023–2024 Reg. Sess.) Sept. 12, 2023,
7 and Senate Bill 261. These documents speak for themselves and provide the best
8 evidence of their contents. To the extent a further response is required, Defendants
9 deny the allegations in Paragraph 34.

10 35. Paragraph 35 consists of argument and legal conclusions to which no
11 response is required. Paragraph 35 also quotes, cites to, and purports to paraphrase
12 *Janus v. Am. Fed’n of State, Cnty. & Mun. Emps., Council 31*, 138 S. Ct. 2448
13 (2018). This case speaks for itself and provides the best evidence of its contents. To
14 the extent a further response is required, Defendants deny the allegations in
15 Paragraph 35.

16 36. Paragraph 36 consists of argument and legal conclusions to which no
17 response is required. Paragraph 36 also quotes, cites to, and purports to paraphrase
18 Senate Bill 261. The Senate Bill speaks for itself and provides the best evidence of
19 its contents. To the extent a further response is required, Defendants deny the
20 allegations in Paragraph 36.

21 37. Paragraph 37 quotes, cites to, and purports to paraphrase Senate Bill 261.
22 The Senate Bill speaks for itself and provides the best evidence of its contents. To
23 the extent a further response is required, Defendants deny the allegations in
24 Paragraph 37.

25 38. Paragraph 38 consists of argument and legal conclusions to which no
26 response is required. Paragraph 38 also quotes, cites to, and purports to paraphrase
27 Senate Bill 261. The Senate Bill speaks for itself and provides the best evidence of
28

1 its contents. To the extent a further response is required, Defendants deny the
2 allegations in Paragraph 38.

3 39. Paragraph 39 quotes, cites to, and purports to paraphrase Senate Bill 261.
4 The Senate Bill speaks for itself and provides the best evidence of its contents. To
5 the extent a further response is required, Defendants deny the allegations in
6 Paragraph 39.

7 40. Paragraph 40 consists of argument and legal conclusions to which no
8 response is required. Paragraph 40 also quotes, cites to, and purports to paraphrase
9 Senate Bill 261. The Senate Bill speaks for itself and provides the best evidence of
10 its contents. To the extent a further response is required, Defendants deny the
11 allegations in Paragraph 40.

12 41. Paragraph 41 consists of argument and legal conclusions to which no
13 response is required. To the extent a further response is required, Defendants deny
14 the allegations in Paragraph 41.

15 42. Paragraph 42 consists of argument and legal conclusions to which no
16 response is required. Paragraph 42 also quotes, cites to, and purports to paraphrase
17 Senate Bill 261. The Senate Bill speaks for itself and provides the best evidence of
18 its contents. To the extent a further response is required, Defendants deny the
19 allegations in Paragraph 42.

20 43. Paragraph 43 consists of argument and legal conclusions to which no
21 response is required. Paragraph 43 also quotes, cites to, and purports to paraphrase
22 Senate Bill 261. The Senate Bill speaks for itself and provides the best evidence of
23 its contents. To the extent a further response is required, Defendants deny the
24 allegations in Paragraph 43.

25 44. Paragraph 44 consists of argument and legal conclusions to which no
26 response is required. Paragraph 44 also quotes, cites to, and purports to paraphrase
27 Senate Bill 253 and Assembly Floor Analysis of S.B. 253 (2023–2024 Reg. Sess.)
28 Sept. 7, 2023. These documents speak for themselves and provide the best evidence

1 of their contents. To the extent a further response is required, Defendants deny the
2 allegations in Paragraph 44.

3 45. Paragraph 45 consists of argument and legal conclusions to which no
4 response is required. To the extent a further response is required, Defendants deny
5 the allegations in Paragraph 45.

6 46. Paragraph 46 consists of argument and legal conclusions to which no
7 response is required. Paragraph 46 also quotes, cites to, and purports to paraphrase
8 Senate Bill 253. The Senate Bill speaks for itself and provides the best evidence of
9 its contents. To the extent a further response is required, Defendants deny the
10 allegations in Paragraph 46.

11 47. Paragraph 47 consists of argument and legal conclusions to which no
12 response is required. Paragraph 47 quotes, cites to, and purports to paragraph
13 Senate Bill 253. The Senate Bill speaks for itself and provides the best evidence of
14 its contents. To the extent a further response is required, Defendants deny the
15 allegations in Paragraph 47.

16 48. Paragraph 48 consists of argument and legal conclusions to which no
17 response is required. Paragraph 48 also quotes, cites to, and purports to paragraph
18 Senate Bill 253. The Senate Bill speaks for itself and provides the best evidence of
19 its contents. To the extent a further response is required, Defendants deny the
20 allegations in Paragraph 48.

21 49. Paragraph 49 consists of argument and legal conclusions to which no
22 response is required. Paragraph 49 also quotes, cites to, and purports to paragraph
23 Senate Bill 253. The Senate Bill speaks for itself and provides the best evidence of
24 its contents. To the extent a further response is required, Defendants deny the
25 allegations in Paragraph 49.

26 50. Paragraph 50 consists of argument and legal conclusions to which no
27 response is required. To the extent a further response is required, Defendants deny
28 the allegations in Paragraph 50.

1 51. Paragraph 51 consists of argument and legal conclusions to which no
2 response is required. Paragraph 51 also quotes, cites to, and purports to paraphrase
3 GREENHOUSE GAS PROTOCOL, TECHNICAL GUIDANCE FOR
4 CALCULATING SCOPE 3 EMISSIONS 18 (version 1.0) (2013),
5 <http://tinyurl.com/2f9n52k2>. This document speaks for itself and provides the best
6 evidence of its contents. To the extent a further response is required, Defendants
7 deny the allegations in Paragraph 51.

8 52. Paragraph 52 consists of argument and legal conclusions to which no
9 response is required. Paragraph 52 also quotes, cites to, and purports to paraphrase
10 Comment of the Williams Companies, Inc. 14, SEC File No. S7-10-22 (June 17,
11 2022), <http://tinyurl.com/y99amdcd> and Enhancement and Standardization of
12 Climate-Related Disclosures for Investors, 87 Fed. Reg. 21,334, 21,387 (proposed
13 Apr. 11, 2022). These documents speak for themselves and provide the best
14 evidence of their contents. To the extent a further response is required, Defendants
15 deny the allegations in Paragraph 52.

16 53. Paragraph 53 consists of argument and legal conclusions to which no
17 response is required. Moreover, these allegations are contradicted by publicly
18 available information, and Defendants deny Plaintiffs' allegations on this ground.
19 Defendants are also without sufficient information to form a belief as to the truth of
20 the allegations in the last sentence of Paragraph 53, and on that basis deny those
21 allegations. To the extent a further response is required, Defendants deny the
22 allegations in Paragraph 53.

23 54. The first sentence of Paragraph 54 consists of argument and legal
24 conclusions to which no response is required. Moreover, Defendants are without
25 sufficient information to form a belief as to the truth of the allegations in Paragraph
26 54. Defendants admit that Plaintiffs have filed a declaration from Mr. Hawkins
27 consistent with these statements, but Defendants have not been permitted to depose
28

1 this declarant or otherwise interrogate these statements. On these bases, Defendants
2 deny these allegations.

3 55. Paragraph 55 consists of argument and legal conclusions to which no
4 response is required. Moreover, Defendants are without sufficient information to
5 form a belief as to the truth of the allegations in Paragraph 55. Defendants admit
6 that Plaintiffs have filed a declaration from Mr. Hawkins consistent with these
7 statements, but Defendants have not been permitted to depose this declarant or
8 otherwise interrogate these statements. On these bases, Defendants deny these
9 allegations.

10 56. Paragraph 56 consists of argument and legal conclusions to which no
11 response is required. Moreover, Defendants are without sufficient information to
12 form a belief as to the truth of the allegations in Paragraph 56. Defendants admit
13 that Plaintiffs have filed a declaration from Mr. Hawkins consistent with these
14 statements, but Defendants have not been permitted to depose this declarant or
15 otherwise interrogate these statements. On these bases, Defendants deny these
16 allegations.

17 57. Defendants are without sufficient information to form a belief as to the
18 truth of the allegations in Paragraph 57. Defendants admit that Plaintiffs have filed
19 a declaration from Mr. White consistent with these statements, but Defendants have
20 not been permitted to depose this declarant or otherwise interrogate these
21 statements. On these bases, Defendants deny these allegations.

22 58. Paragraph 58 consists of argument and legal conclusions to which no
23 response is required. Moreover, Defendants are without sufficient information to
24 form a belief as to the truth of the allegations in Paragraph 58. Defendants admit
25 that Plaintiffs have filed a declaration from Mr. White consistent with these
26 statements, but Defendants have not been permitted to depose this declarant or
27 otherwise interrogate these statements. On these bases, Defendants deny these
28 allegations.

1 59. Paragraph 59 consists of argument and legal conclusions to which no
2 response is required. Moreover, Defendants are without sufficient information to
3 form a belief as to the truth of the allegations in Paragraph 59. Defendants admit
4 that Plaintiffs have filed a declaration from Mr. White consistent with these
5 statements, but Defendants have not been permitted to depose this declarant or
6 otherwise interrogate these statements. On these bases, Defendants deny these
7 allegations.

8 60. Paragraph 60 consists of argument and legal conclusions to which no
9 response is required. Paragraph 60 also quotes, cites to, and purports to paragraph
10 Senate Bill 253. Senate Bill 253 speaks for itself and provides the best evidence of
11 its contents. To the extent a further response is required, Defendants deny the
12 allegations in Paragraph 60.

13 61. Paragraph 61 consists of argument and legal conclusions to which no
14 response is required. Paragraph 61 also quotes, cites to, and purports to paragraph
15 Senate Bill 253. Senate Bill 253 speaks for itself and provides the best evidence of
16 its contents. To the extent a further response is required, Defendants deny the
17 allegations in Paragraph 61.

18 62. Paragraph 62 consists of argument and legal conclusions to which no
19 response is required. Paragraph 62 also quotes, cites to, and purports to paragraph
20 Senate Bill 253. Senate Bill 253 speaks for itself and provides the best evidence of
21 its contents. To the extent a further response is required, Defendants deny the
22 allegations in Paragraph 62.

23 63. Paragraph 63 consists of argument and legal conclusions to which no
24 response is required. Paragraph 63 also quotes, cites to, and purports to paragraph
25 Senate Bill 253. Senate Bill 253 speaks for itself and provides the best evidence of
26 its contents. To the extent a further response is required, Defendants deny the
27 allegations in Paragraph 63.
28

1 64. Paragraph 64 consists of argument and legal conclusions to which no
2 response is required. Paragraph 64 also quotes, cites to, and purports to paraphrase
3 *Wooley v. Maynard*, 430 U.S. 705 (1977), *Hurley v. Irish-Am. Gay, Lesbian &*
4 *Bisexual Grp. of Bos.*, 515 U.S. 557 (1995) and *Janus v. Am. Fed’n of State, Cnty.*
5 *& Mun. Emps., Council 31*, 138 S. Ct. 2448 (2018). These cases speak for
6 themselves and provide the best evidence of their contents. To the extent a further
7 response is required, Defendants deny the allegations in Paragraph 64.

8 65. Paragraph 65 consists of argument and legal conclusions to which no
9 response is required. Paragraph 65 also quotes, cites to, and purports to paraphrase
10 *Nat’l Inst. of Family & Life Advocates v. Becerra* (“NIFLA”), 138 S. Ct. 2361
11 (2018), *Janus v. Am. Fed’n of State, Cnty. & Mun. Emps., Council 31*, 138 S. Ct.
12 2448 (2018) and *IMDB.com Inc. v. Becerra*, 962 F.3d 1111 (9th Cir. 2020). These
13 cases speak for themselves and provide the best evidence of their contents. To the
14 extent a further response is required, Defendants deny the allegations in Paragraph
15 65.

16 66. Paragraph 66 consists of argument and legal conclusions to which no
17 response is required. Paragraph 66 also quotes, cites to, and purports to paraphrase
18 *Nat’l Inst. of Family & Life Advocates v. Becerra* (“NIFLA”), 138 S. Ct. 2361
19 (2018) and *Janus v. Am. Fed’n of State, Cnty. & Mun. Emps., Council 31*, 138 S.
20 Ct. 2448 (2018). These cases speak for themselves and provide the best evidence of
21 their contents. To the extent a further response is required, Defendants deny the
22 allegations in Paragraph 66.

23 67. Paragraph 67 consists of argument and legal conclusions to which no
24 response is required. Paragraph 67 also quotes, cites to, and purports to paraphrase
25 *Janus v. Am. Fed’n of State, Cnty. & Mun. Emps., Council 31*, 138 S. Ct. 2448
26 (2018) and Senate Bill 261. These documents speak for themselves and provide the
27 best evidence of their contents. To the extent a further response is required,
28 Defendants deny the allegations in Paragraph 67.

1 68. Paragraph 68 consists of argument and legal conclusions to which no
2 response is required. Paragraph 68 also quotes, cites to, and purports to paraphrase
3 *Nat'l Inst. of Family & Life Advocates v. Becerra* ("NIFLA"), 138 S. Ct. 2361
4 (2018) and Senate Bills 253 and 261. These documents speak for themselves and
5 provide the best evidence of their contents. To the extent a further response is
6 required, Defendants deny the allegations in Paragraph 68.

7 69. Paragraph 69 consists of argument and legal conclusions to which no
8 response is required. Paragraph 69 also purports to describe Senate Bills 253 and
9 261. The Senate Bills speak for themselves and provide the best evidence of their
10 contents. Moreover, the allegations in the third, fourth, and fifth sentences of
11 Paragraph 69 consist of vague and ambiguous terms about which Defendants lack
12 sufficient information to respond. To the extent a further response is required,
13 Defendants deny the allegations in Paragraph 69.

14 70. Paragraph 70 consists of argument and legal conclusions to which no
15 response is required. Paragraph 70 also quotes, cites to, and purports to paraphrase
16 *Nat'l Inst. of Family & Life Advocates v. Becerra* ("NIFLA"), 138 S. Ct. 2361
17 (2018) and *Ariix, LLC v. NutriSearch Corp.*, 985 F.3d 1107 (9th Cir. 2021). These
18 cases speak for themselves and provide the best evidence of their contents. To the
19 extent a further response is required, Defendants deny the allegations in Paragraph
20 70.

21 71. Paragraph 71 consists of argument and legal conclusions to which no
22 response is required. To the extent a further response is required, Defendants deny
23 the allegations in Paragraph 71.

24 72. Paragraph 72 consists of argument and legal conclusions to which no
25 response is required. Paragraph 72 also quotes, cites to, and purports to paraphrase
26 *Nat'l Inst. of Family & Life Advocates v. Becerra* ("NIFLA"), 138 S. Ct. 2361
27 (2018). This case speaks for itself and provides the best evidence of its contents. To
28

1 the extent a further response is required, Defendants deny the allegations in
2 Paragraph 72.

3 73. Paragraph 73 consists of argument and legal conclusions to which no
4 response is required. To the extent a further response is required, Defendants deny
5 the allegations in Paragraph 73.

6 74. Paragraph 74 consists of argument and legal conclusions to which no
7 response is required. Moreover, these allegations are contradicted by publicly
8 available information, and Defendants deny Plaintiffs' allegations on this ground.
9 Otherwise, the Senate Bills and legislative history speak for themselves and provide
10 the best evidence of their contents. To the extent a further response is required,
11 Defendants deny the allegations in Paragraph 74.

12 75. Paragraph 75 consists of argument and legal conclusions to which no
13 response is required. Paragraph 75 also quotes, cites to, and purports to paraphrase
14 Senate Bills 253 and 261. These Senate Bills speak for themselves and provide the
15 best evidence of their contents. To the extent a further response is required,
16 Defendants deny the allegations in Paragraph 75.

17 76. Paragraph 76 consists of argument and legal conclusions to which no
18 response is required. Paragraph 76 also quotes, cites to, and purports to paraphrase
19 *McCullen v. Coakley*, 573 U.S. 464 (2014) and Comment of the Williams
20 Companies, Inc. SEC File No. S7-10-22 (June 17, 2022)
21 <http://tinyurl.com/y99amdcd>. These documents speak for themselves and provide
22 the best evidence of their contents. To the extent a further response is required,
23 Defendants deny the allegations in Paragraph 76.

24 77. Paragraph 77 consists of argument and legal conclusions to which no
25 response is required. Moreover, Defendants are without sufficient information to
26 form a belief as to the truth of the allegations in Paragraph 77. Defendants admit
27 that Plaintiffs have filed declarations from Mr. Hawkins and Mr. White consistent
28 with these statements, but Defendants have not been permitted to depose these

1 declarants or otherwise interrogate these statements. To the extent a further
2 response is required, Defendants deny these allegations.

3 78. Paragraph 78 consists of argument and legal conclusions to which no
4 response is required. Paragraph 78 quotes, cites to, and purports to paraphrase *Nat'l*
5 *Inst. of Family & Life Advocates v. Becerra* ("NIFLA"), 138 S. Ct. 2361 (2018).
6 This case speaks for itself and provides the best evidence of its contents. To the
7 extent a further response is required, Defendants deny the allegations in Paragraph
8 78.

9 79. Paragraph 79 consists of argument and legal conclusions to which no
10 response is required. Paragraph 79 also quotes, cites to, and purports to paraphrase
11 *Nat'l Inst. of Family & Life Advocates v. Becerra* ("NIFLA"), 138 S. Ct. 2361
12 (2018), *Ibanez v. Fla. Dep't of Bus. & Prof'l Reg.*, 512 U.S. 136 (1994), and Senate
13 Bills 253 and 261. These documents speak for themselves and provide the best
14 evidence of their contents. To the extent a further response is required, Defendants
15 deny the allegations in Paragraph 79.

16 80. Paragraph 80 consists of argument and legal conclusions to which no
17 response is required. Paragraph 80 also quotes, cites to, and purports to paraphrase
18 Senate Bills 253 and 261. These Senate Bills speak for themselves and provide the
19 best evidence of their contents. Moreover, these allegations are contradicted by
20 publicly available information, and Defendants deny Plaintiffs' allegations on this
21 ground. To the extent a further response is required, Defendants deny the
22 allegations in Paragraph 80.

23 81. Paragraph 81 consists of argument and legal conclusions to which no
24 response is required. Paragraph 81 quotes, cites to, and purports to paraphrase
25 *O'Brien v. Welty*, 818 F.3d 920 (9th Cir. 2016) and *FCC v. Fox Television Stations*,
26 567 U.S. 239 (2012). These cases speak for themselves and provide the best
27 evidence of their contents. To the extent a further response is required, Defendants
28 deny the allegations in Paragraph 81.

1 82. Paragraph 82 consists of argument and legal conclusions to which no
2 response is required. Paragraph 82 also quotes, cites to, and purports to paraphrase
3 Senate Bills 261. The Senate Bill speaks for itself and provides the best evidence of
4 its contents. To the extent a further response is required, Defendants deny the
5 allegations in Paragraph 82.

6 83. Paragraph 83 consists of argument and legal conclusions to which no
7 response is required. Paragraph 83 also purports to paraphrase Senate Bills 261.
8 The Senate Bill speaks for itself and provides the best evidence of its contents. To
9 the extent a further response is required, Defendants deny the allegations in
10 Paragraph 83.

11 84. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
12 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
13 Paragraph 84 is required. To the extent a response is required: Paragraph 84
14 consists of argument and legal conclusions to which no response is required.
15 Paragraph 84 also quotes, cites to, and purports to paraphrase Clean Air Act
16 Amendments of 1970, Pub. L. No. 91-604, 84 Stat. 1676, *Nat'l Pork Producers*
17 *Council v. Ross*, 598 U.S. 356 (2023) and *Franchise Tax Bd. of Cal. v. Hyatt*, 139
18 S. Ct. 1485 (2019). These documents speak for themselves and provide the best
19 evidence of their contents. To the extent a further response is required, Defendants
20 deny the allegations in Paragraph 84.

21 85. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
22 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
23 Paragraph 85 is required. To the extent a response is required: Paragraph 85
24 consists of argument and legal conclusions to which no response is required.
25 Paragraph 85 also quotes, cites to, and purports to paraphrase *Haaland v. Brackeen*,
26 599 U.S. 255 (2023), *Gade v. Nat'l Solid Wastes Mgmt. Ass'n*, 505 U.S. 88 (1992)
27 and *City of N.Y. v. Chevron Corp.*, 993 F.3d 81 (2d Cir. 2021). These cases speak
28

1 for themselves and provide the best evidence of their contents. To the extent a
2 further response is required, Defendants deny the allegations in Paragraph 85.

3 86. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
4 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
5 Paragraph 86 is required. To the extent a response is required: Paragraph 86
6 consists of argument and legal conclusions to which no response is required.
7 Paragraph 86 also quotes, cites to, and purports to paraphrase *City of N.Y. v.*
8 *Chevron Corp.*, 993 F.3d 81(2d Cir. 2021). This case speaks for itself and provides
9 the best evidence of its contents. To the extent a further response is required,
10 Defendants deny the allegations in Paragraph 86.

11 87. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
12 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
13 Paragraph 87 is required. To the extent a response is required: Paragraph 87
14 consists of argument and legal conclusions to which no response is required.
15 Paragraph 87 purports to describe Senate Bills 253 and 261. The Senate Bills speak
16 for themselves and provide the best evidence of their contents. To the extent a
17 further response is required, Defendants deny the allegations in Paragraph 87.

18 88. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
19 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
20 Paragraph 88 is required. To the extent a response is required: Paragraph 88
21 consists of argument and legal conclusions to which no response is required.
22 Paragraph 88 also quotes, cites to, and purports to paraphrase *Students for Fair*
23 *Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181 (2023).
24 This case speaks for itself and provides the best evidence of its contents. To the
25 extent a further response is required, Defendants deny the allegations in Paragraph
26 88.

27 89. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
28 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to

1 Paragraph 89 is required. To the extent a response is required: Paragraph 89
2 consists of argument and legal conclusions to which no response is required.
3 Paragraph 89 consists of argument and legal conclusions to which no response is
4 required. Paragraph 89 also quotes, cites to, and purports to paraphrase Senate Bills
5 253 and 261. These Senate Bills speak for themselves and provide the best evidence
6 of their contents. To the extent a further response is required, Defendants deny the
7 allegations in Paragraph 89.

8 90. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
9 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
10 Paragraph 90 is required. To the extent a response is required: Paragraph 90
11 consists of argument and legal conclusions to which no response is required.
12 Paragraph 90 also quotes, cites to, and purports to paraphrase Remarks of Sen.
13 Wiener, Debate on S.B. 253, Sen. Floor Sess. (May 30, 2023)
14 <http://tinyurl.com/225dekr5>. This document speaks for itself and provides the best
15 evidence of its contents. Moreover, as to the first sentence of Paragraph 90,
16 Defendants are without sufficient information to form a belief as to the truth of
17 these allegations, and on that basis deny them. To the extent a further response is
18 required, Defendants deny the allegations in Paragraph 90.

19 91. Plaintiffs' Supremacy Clause and Extraterritoriality claims were
20 dismissed (ECF No. 77 at 23-24), and Plaintiffs did not amend, so no response to
21 Paragraph 91 is required. To the extent a response is required: Paragraph 91
22 consists of argument and legal conclusions to which no response is required. To the
23 extent a further response is required, Defendants deny the allegations in Paragraph
24 91.

25 **FIRST CLAIM FOR RELIEF**

26 92. Defendants incorporate by reference all preceding paragraphs.
27
28

1 93. Paragraph 93 consists of argument and legal conclusions to which no
2 response is required. To the extent a further response is required, Defendants deny
3 the allegations in Paragraph 93.

4 94. Paragraph 94 consists of argument and legal conclusions to which no
5 response is required. To the extent a further response is required, Defendants deny
6 the allegations in Paragraph 94.

7 95. Paragraph 95 consists of argument and legal conclusions to which no
8 response is required. Paragraph 95 also purports to describe Senate Bill 261. The
9 Senate Bill speaks for itself and provides the best evidence of its contents. To the
10 extent a further response is required, Defendants deny the allegations in Paragraph
11 95.

12 96. Paragraph 96 consists of argument and legal conclusions to which no
13 response is required. Paragraph 96 also purports to describe Senate Bill 253. The
14 Senate Bill speaks for itself and provides the best evidence of its contents. To the
15 extent a further response is required, Defendants deny the allegations in Paragraph
16 96.

17 97. Paragraph 97 consists of argument and legal conclusions to which no
18 response is required. Paragraph 97 also purports to describe Senate Bill 253. The
19 Senate Bill speaks for itself and provides the best evidence of its contents. To the
20 extent a further response is required, Defendants deny the allegations in Paragraph
21 97.

22 98. Paragraph 98 consists of argument and legal conclusions to which no
23 response is required. Paragraph 98 also purports to describe Senate Bill 253. The
24 Senate Bill speaks for itself and provides the best evidence of its contents. To the
25 extent a further response is required, Defendants deny the allegations in Paragraph
26 98.

1 99. Paragraph 99 consists of argument and legal conclusions to which no
2 response is required. To the extent a further response is required, Defendants deny
3 the allegations in Paragraph 99.

4 **SECOND CLAIM FOR RELIEF**

5 100. Defendants incorporate by reference all preceding paragraphs.

6 101. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
7 23-24), and Plaintiffs did not amend, so no response to Paragraph 101 is required.
8 In the event a response is required: Paragraph 101 consists of argument and legal
9 conclusions to which no response is required. To the extent a further response is
10 required, Defendants deny the allegations in Paragraph 101.

11 102. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
12 23-24), and Plaintiffs did not amend, so no response to Paragraph 102 is required.
13 In the event a response is required: Paragraph 102 consists of argument and legal
14 conclusions to which no response is required. To the extent a further response is
15 required, Defendants admit that the laws are not limited to companies that are
16 headquartered or incorporated in the State of California; Defendants deny all
17 remaining allegations in Paragraph 102.

18 103. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
19 23-24), and Plaintiffs did not amend, so no response to Paragraph 103 is required.
20 In the event a response is required: Paragraph 103 consists of argument and legal
21 conclusions to which no response is required. To the extent a further response is
22 required, Defendants admit that the laws are not limited to reporting of emissions or
23 risks from within the State; Defendants deny all remaining allegations in Paragraph
24 103.

25 104. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
26 23-24), and Plaintiffs did not amend, so no response to Paragraph 104 is required.
27 In the event a response is required: Paragraph 104 consists of argument and legal
28

1 conclusions to which no response is required. To the extent a further response is
2 required, Defendants deny the allegations in Paragraph 104.

3 105. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
4 23-24), and Plaintiffs did not amend, so no response to Paragraph 105 is required.
5 In the event a response is required: Paragraph 105 consists of argument and legal
6 conclusions to which no response is required. To the extent a further response is
7 required, Defendants deny the allegations in Paragraph 105.

8 106. Plaintiffs' Supremacy Clause claim was dismissed (ECF No. 77 at
9 23-24), and Plaintiffs did not amend, so no response to Paragraph 106 is required.
10 In the event a response is required: Paragraph 106 consists of argument and legal
11 conclusions to which no response is required. To the extent a further response is
12 required, Defendants deny the allegations in Paragraph 106.

13 **THIRD CLAIM FOR RELIEF**

14 107. Defendants incorporate by reference all preceding paragraphs.

15 108. Plaintiffs' Extraterritoriality claim was dismissed (ECF No. 77 at
16 23-24), and Plaintiffs did not amend, so no response to Paragraph 108 is required.
17 In the event a response is required: Paragraph 108 consists of argument and legal
18 conclusions to which no response is required. To the extent a further response is
19 required, Defendants deny the allegations in Paragraph 108.

20 109. Plaintiffs' Extraterritoriality claim was dismissed (ECF No. 77 at
21 23-24), and Plaintiffs did not amend, so no response to Paragraph 109 is required.
22 In the event a response is required: Paragraph 109 consists of argument and legal
23 conclusions to which no response is required. Paragraph 109 also quotes, cites to,
24 and purports to paraphrase Senate Bills 253 and 261, and *Nat'l Pork Producers*
25 *Council v. Ross*, 598 U.S. 356 (2023). These documents speak for themselves and
26 provide the best evidence of their contents. To the extent a further response is
27 required, Defendants deny the allegations in Paragraph 109.
28

1 110. Plaintiffs' Extraterritoriality claim was dismissed (ECF No. 77 at
2 23-24), and Plaintiffs did not amend, so no response to Paragraph 110 is required.
3 In the event a response is required: Paragraph 110 consists of argument and legal
4 conclusions to which no response is required. To the extent a further response is
5 required, Defendants deny the allegations in Paragraph 110.

6 111. Plaintiffs' Extraterritoriality claim was dismissed (ECF No. 77 at
7 23-24), and Plaintiffs did not amend, so no response to Paragraph 111 is required.
8 In the event a response is required: Paragraph 111 consists of argument and legal
9 conclusions to which no response is required. Paragraph 111 also purports to
10 describe Senate Bills 253 and 261. The Senate Bills speak for themselves and
11 provide the best evidence of their contents. To the extent a further response is
12 required, Defendants deny the allegations in Paragraph 111.

13 112. Plaintiffs' Extraterritoriality claim was dismissed (ECF No. 77 at
14 23-24), and Plaintiffs did not amend, so no response to Paragraph 112 is required.
15 In the event a response is required: Paragraph 112 consists of argument and legal
16 conclusions to which no response is required. To the extent a further response is
17 required, Defendants deny the allegations in Paragraph 112.

18 **FOURTH CLAIM FOR RELIEF**

19 113. Defendants incorporate by reference all preceding paragraphs.

20 114. Paragraph 114 quotes, cites to, and purports to paraphrase 42 U.S.C.
21 § 1983 and 42 U.S.C. § 1988. These statutes speak for themselves and provide the
22 best evidence of their contents.

23 115. Paragraph 115 consists of argument and legal conclusions to which
24 no response is required. Paragraph 115 purports to describe 42 U.S.C. § 1988 and
25 "all other applicable statutes." These statutes speak for themselves and provide the
26 best evidence of their contents. To the extent a further response is required,
27 Defendants deny the allegations in Paragraph 115.
28

PRAYER FOR RELIEF

116. The remainder of the First Amended Complaint consists of Plaintiff's prayer for relief and requires no response. To the extent that a response is required, the Attorney General denies that the Plaintiff is entitled to the relief requested or any other relief.

AFFIRMATIVE DEFENSES

First Affirmative Defense

117. Each of Plaintiffs' causes of action, separately and conjunctively, fail to state a claim upon which relief can be granted against Defendants.

Second Affirmative Defense

118. Each of Plaintiffs' causes of action, separately and conjunctively, are barred by the Court's lack of subject matter jurisdiction over Plaintiffs' claims.

Third Affirmative Defense

119. Each of Plaintiffs' causes of action, separately and conjunctively, are not ripe for resolution by this Court.

Fourth Affirmative Defense

120. Each of Plaintiffs' causes of action, separately and conjunctively, are barred against Defendants for lack of standing.

Fifth Affirmative Defense

121. Each of Plaintiffs' causes of action, separately and conjunctively, are barred against Defendants by the doctrines of estoppel, waiver, and/or laches.

Sixth Affirmative Defense

122. Each of Plaintiffs' causes of action, separately and conjunctively, cannot meet the standard for an injunction.

Seventh Affirmative Defense

123. Each of Plaintiffs' causes of action and pleas for relief, separately and conjunctively, are barred against one or more Defendants due to sovereign

immunity, except in so far as the relief request is consistent with *Ex parte Young*, 209 U.S. 123 (1908).

124. Defendants reserve the right to amend this answer, as permitted by Fed. R. Civ. P. 15, and to assert additional affirmative defenses become apparent over the course of this action.

PRAYER FOR RELIEF

125. That the Court deny Plaintiffs' request for declaratory and injunctive relief;

126. That the Court deny Plaintiffs' request for a preliminary injunction and decline to issue any provisional relief of any kind against Defendants;

127. That the Court deny Plaintiffs' request for attorney fees and costs;

128. That Plaintiffs take nothing by reason of their Complaint;

129. That judgment be rendered in favor of Defendants;

130. That Defendants be awarded costs of suit incurred in defense of this action; and

131. For such other relief as the Court deems just and proper.

Dated: March 17, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
MYUNG J. PARK
Supervising Deputy Attorney General

/s/ Caitlan McLoon

CAITLAN MCLOON
Deputy Attorney General
*Attorneys for Defendants Liane M.
Randolph, Steven S. Cliff, and Robert
A. Bonta*

SA2024300503
67498990.docx

CERTIFICATE OF SERVICE

Case Name: **Chamber of Commerce of the United States of America, et al.
v. Liane M. Randolph, et al.**

Case No.: **2:24-cv-00801-ODW-PVCx**

I hereby certify that on March 17, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DEFENDANTS' ANSWER TO AMENDED COMPLAINT

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 17, 2025, at Los Angeles, California.

Carol Chow
Declarant

/s/ Carol Chow
Signature

SA2024300503