

No. 23-1351

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**United States Court of Appeals**  
*for the*  
**Fourth Circuit**

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MARYLAND SHALL ISSUE, INC., *et al.*,

*Plaintiffs-Appellants,*

– v. –

ANNE ARUNDEL COUNTY, MARYLAND

*Defendant-Appellee.*

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND, NO. 22-CV-865 (Gallagher, J.)

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**MOTION FOR LEAVE TO FILE BRIEF OF  
DOROTHY PAUGH, GWENDOLYN LA CROIX,  
CHERYL BROOKS, DON BAUGHAN, AND PATTI  
BROCKINGTON AS AMICI CURIAE IN SUPPORT  
OF APPELLEE AND AFFIRMANCE**

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Pursuant to Rule 29 of the Federal Rules of Appellate Procedure, Dorothy Paugh, Gwendolyn La Croix, Cheryl Brooks, Don Baughan, and Patti Brockington (“Movants”) respectfully request leave to file the brief in support of Appellee Anne Arundel County submitted contemporaneously herewith.

### **IDENTITY OF MOVANTS**

Movants are survivors of firearm suicide. Dorothy Paugh lost her father Edwin and her son Peter. Gwendolyn La Croix lost her son Jonah. Cheryl Brooks and Don Baughan lost their son Michael. Patti Brockington would have died by suicide if her family had not taken her gun from her house.

### **MOVANTS’ BRIEF PROVIDES A UNIQUE PERSPECTIVE ON THE ISSUES IN THIS CASE**

Movants write to share their experiences with the Court as it considers Anne Arundel County’s ordinance requiring that gun buyers be provided with information about risks factors for suicide at the time of purchase.

As survivors of firearm suicide, Movants offer the court a unique perspective on the potential impact of Anne Arundel’s ordinance. They tell the stories of five people who had access to guns, struggled with

depression or trauma, and either used a firearm to end their lives or attempted to do so. Based on their experience, Movants strongly believe that other suicides could be prevented if gun buyers are warned about suicide risk factors, and are provided with information on safe storage and mental health resources. They believe that Anne Arundel County's ordinance achieves that important goal.

All parties consent to the filing of Movants' brief.

### **CONCLUSION**

Movants respectfully request leave to file the brief in support of Appellee Anne Arundel County submitted contemporaneously herewith.

July 17, 2023

Respectfully submitted,

*/s/ Andrew R. Dunlap*

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Brooks, Don Baughan, and Patti  
Brockington*

**CERTIFICATE OF COMPLIANCE**

This motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A). It contains 264 words, excluding the parts of the motion excluded by Fed. R. App. P. 32(f). This brief complies with Rule 32(a)(5)'s typeface requirements and Rule 32(a)(6)'s type-style requirements because it has been prepared in a proportionately spaced typeface using Microsoft Word in 14-point Century Schoolbook font.

July 17, 2023

/s/ *Andrew R. Dunlap*  
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Andrew R. Dunlap

**CERTIFICATE OF SERVICE**

I hereby certify that I caused this document to be electronically filed with the Clerk of the Court using the appellate CM/ECF system on July 17, 2023. All participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

July 17, 2023

/s/ Andrew R. Dunlap  
Andrew R. Dunlap