

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KATHERINE NOVOTNY, *et al.*,

*

Plaintiffs,

*

v.

*

No. 1:23-cv-01295-GLR

WESTLEY MOORE, *et al.*,

*

Defendants.

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* * * * *

**CONSENT MOTION FOR LEAVE TO FILE
MEMORANDA OF LAW EXCEEDING PAGE LIMITS**

Defendants, through their undersigned counsel, with the consent of plaintiffs, and pursuant to Local Rule 105, hereby move for leave to allow the parties to file memoranda of law in excess of the page limits set by Local Rule 105.3. In support thereof, defendants state as follows:

1. Plaintiffs have moved for a preliminary injunction in this case asking the Court to preliminarily enjoin certain aspects of Maryland's laws and regulations prohibiting carrying concealed firearms in certain sensitive locations such as hospitals, museums, public transit, taverns serving alcohol and State parks. (ECF 24.)

2. Defendants are scheduled to respond to plaintiffs' motion for preliminary injunction on June 28, 2023. (ECF 28.)

3. Plaintiffs' motion argues that certain of Maryland's restrictions on carrying firearms in certain places violate the Second Amendment because they are not consistent

with the history and tradition of firearms regulation in the United States. (ECF 24 at 1-2, citing *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 142 S. Ct. 2111 (2022)).

4. Given the vast amount of historical research and legal analysis necessary to respond to all of plaintiffs’ arguments, defendants require additional pages to fully respond to the motion.

5. This case presents important issues of public policy. Plaintiffs’ request that the Court enjoin laws designed to protect public safety and reduce gun violence requires fully developed and thorough briefing.

6. Counsel for defendants has conferred with counsel for plaintiffs concerning the requested relief in this motion. The parties’ consent to defendants filing a memorandum of law opposing plaintiffs’ motion for a preliminary injunction that does not exceed 60 pages and to plaintiffs filing a reply memorandum that does not exceed 45 pages.

7. No harm or prejudice will be caused to any party if the requested relief is granted.

WHEREFORE, for the reasons stated herein, defendants respectfully request that this Honorable Court grant leave to allow defendants to file a response to plaintiffs’ motion for preliminary injunction that does not exceed 60 pages and to allow plaintiffs to file a reply memorandum that does not exceed 45 pages, and that this Court grant such other and further relief that it may deem appropriate.

Respectfully submitted,

ANTHONY G. BROWN
Attorney General of Maryland

/s/ James N. Lewis

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June 26, 2023

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that, on this 26th day of June, 2023 the foregoing was served, along with a proposed order, by CM/ECF on all registered CM/ECF users.

/s/ James N. Lewis

James N. Lewis