

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY RIFLE )  
& PISTOL CLUBS, INC., )  
) )  
BLAKE ELLMAN, *and* )  
) )  
ALEXANDER DEMBOWSKI, )  
) )  
*Plaintiffs,* )  
) )  
v. )  
) )  
GURBIR GREWAL, in his official capacity )  
as Attorney General of New Jersey, )  
) )  
PATRICK J. CALLAHAN, in his official )  
capacity as Superintendent of the New Jersey )  
Division of State Police, )  
) )  
THOMAS WILLIVER, in his official )  
capacity as Chief of Police of the Chester )  
Police Department, *and* )  
) )  
JAMES B. O’CONNOR, in his official )  
capacity as Chief of Police of the Lyndhurst )  
Police Department, )  
) )  
*Defendants.* )

**HON. PETER G. SHERIDAN, U.S.D.J.**

**HON. LOIS H. GOODMAN, U.S.M.J.**

**CIVIL ACTION NO. 18-cv-10507**

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

**NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE, that on July 16, 2018, at 9:30 a.m. or as soon thereafter as Counsel may be heard, Plaintiffs, Association of New Jersey Rifle & Pistol Clubs, Inc., Blake Ellman, and Alexander Dembowski (collectively “Plaintiffs”) shall move before the Honorable Peter G. Sheridan, U.S.D.J., at the United States Courthouse, Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608, for an Order granting a

preliminary injunction, pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, enjoining the operation and effect of New Jersey Assembly Bill No. 2761.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiffs shall rely upon the following documents:

- 1) Declaration of Gary Kleck,
- 2) Declaration of James Curcuruto,
- 3) Declaration of Blake Ellman,
- 4) Declaration of Alexander Dembowski,
- 5) Declaration of Scott Bach,
- 6) Declaration of Daniel L. Schmutter, and
- 7) Brief.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: June 21, 2018

Respectfully submitted,

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Peter A. Patterson\*  
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J. Joel Alicea\*  
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s/ Daniel L. Schmutter  
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\**Pro hac vice* application forthcoming

*Attorneys for Plaintiffs*