

a broad and deep perspective on the issues raised and has a compelling interest in the federal courts' interpretation of Second Amendment issues.

The proposed brief argues that the District of Columbia's permitting process is substantially similar to those upheld by other circuits and does not violate the Second Amendment as it is a valid exercise of the District's police powers in furtherance of public safety. By providing an overview of the policy implications of increasing the number of firearms in the public sphere, the proposed brief explains how the current permitting process furthers the District's important interest of limiting public carrying to those individuals who have a particularized need for self-defense. This overview includes an analysis of sociological data, newspaper articles, statutes, and legal commentary that are not addressed by the parties. Several of these materials are specific to the unique public safety situation in the District of Columbia. Unlike the parties, the proposed brief also examines the extent to which an analogy can be appropriately drawn between the constitutional analysis of laws implicating the Second Amendment and those implicating the First Amendment. *Amicus*, therefore, respectfully submits the attached brief to assist the Court in deciding the complex and significant issues raised in this matter.

The defendants have consented to the filing of this *amicus* brief. The plaintiffs have represented that they would have consented to the filing of the proposed brief had it been filed on or before January 19, 2016, but because it was filed three days later, they do not consent. Despite the plaintiffs' objection, the Brady Center respectfully submits that it complied with the applicable local rule by filing this motion "in a timely manner such that it does not unduly delay the Court's ability to rule on [this] matter." LCvR 7(o)(2). Because the parties' briefing of the application for a preliminary or permanent injunction was completed only today, the Brady

Center's motion did not delay the Court's ability to rule on that application. Indeed, the hearing on the plaintiffs' application is not scheduled to occur until February 2, 2015—more than ten (10) days after the filing of this motion. Moreover, the Brady Center satisfied the applicable rule of appellate procedure as it filed the instant motion and proposed *amicus* brief “7 days after the principal brief of the party being supported[,]” *i.e.* the defendants, was filed on January 15, 2016. Fed. R. App. P. 29(e). By doing so, the Brady Center was able to review the defendants' opposition and ensure before filing that the proposed brief would provide a relevant perspective that is not duplicative of those offered by the parties. As a result, this Court should grant the Brady Center's motion over the plaintiffs' objection.

The proposed brief, which includes a corporate disclosure statement, is attached hereto as Exhibit A for the convenience of the Court and counsel. A proposed order is attached as Exhibit B.

CONCLUSION

For the foregoing reasons, *amicus curiae* Brady Center to Prevent Gun Violence respectfully requests that the Court grant leave to file the attached *amicus* brief.

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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