

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

MATTHEW GRACE and
PINK PISTOLS,

Plaintiffs,

v.

DISTRICT OF COLUMBIA and
CATHY LANIER,

Defendants.

Civil Action No. 15–2234 (RJL)

**MOTION OF EVERYTOWN FOR GUN SAFETY FOR LEAVE
TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF DEFENDANTS**

Everytown for Gun Safety respectfully moves under LCvR 7(o) for leave to file a brief as *amicus curiae* in support of the defendants’ opposition to the plaintiffs’ application for a preliminary or permanent injunction. Everytown’s brief presents this Court with previously overlooked historical materials showing that the District of Columbia statute at issue carries forward a seven-century Anglo-American tradition of restrictions on the public carry of firearms.

Everytown for Gun Safety is the nation’s largest gun-violence-prevention organization. With more than three million supporters—including a network of more than 1,000 current and former mayors from nearly every state and the District of Columbia—it advocates for common-sense gun laws across the country.

Over the past several years, Everytown has devoted substantial resources to researching historical firearms legislation and thus can provide this Court with important historical context that is directly relevant to the constitutionality of the District of Columbia statute. Everytown has drawn on this historical expertise to file briefs in several recent Second Amendment cases, including the two most recent appeals concerning Second Amendment challenges to restrictions

on public carry—*Wrenn v. District of Columbia*, No. 15–162, (D.C. Cir.) and *Peruta v. San Diego*, No. 10–56971 (9th Cir.) (en banc). It seeks to do the same here.

In addition, Everytown has a large number of supporters who live and work in the District of Columbia and who believe that an injunction against the District’s “good reason” requirement for public carry would make their homes, workplaces, and neighborhoods less safe. The current mayor of the District of Columbia is a member of Everytown’s Mayors Against Illegal Guns coalition. Former mayors Adrian Fenty and Anthony Williams, one of the founding members of Mayors Against Illegal Guns, were also members and were vocal advocates for Everytown’s priorities while in office.

All parties have consented to the filing of this proposed *amicus* brief. The proposed *amicus* brief (including a certificate of corporate disclosure) is attached as an exhibit to this motion, as is an appendix of historical gun laws. A proposed order is attached as well.

Respectfully submitted,

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