

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHUI W. KWONG; GEORGE GRECO; GLENN
HERMAN; NICK LIDAKIS; TIMOTHY S.
FUREY; DANIELA GRECO; NUNZIO CALCE;
SECOND AMENDMENT FOUNDATION, INC.;
and THE NEW YORK STATE RIFLE & PISTOL
ASSOCIATION, INC.,

Plaintiffs,

-against-

MICHAEL BLOOMBERG, in his Official
Capacity as Mayor of the City of New York; and
CITY OF NEW YORK,

Defendants.

-and-

ATTORNEY GENERAL OF THE STATE OF
NEW YORK,

Intervenor.

No. 11 Civ. 2356 (JGK) (DCF)

ECF Case

NOTICE OF MOTION


PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil
Procedure and the Scheduling Order in this case, Plaintiffs move for summary judgment that:

1. New York City's \$340 fee for a "Residence Premises" handgun license, N.Y.C. Admin. Code § 10-131(a)(2), is constitutionally impermissible; and
2. Section 400(14) of the New York Penal Law denies equal protection of the law, as-applied to authorize a "Residence Premises" handgun license fee in excess of \$10.

PLEASE TAKE FURTHER NOTICE that Plaintiffs rely upon the Memorandum of Law,
Statement of Undisputed Facts, and supporting Declarations and Exhibits filed herewith.

Dated: New York, New York
June 22, 2011

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