

No. 14-1945

IN THE
United States Court of Appeals
For the Fourth Circuit

STEPHEN V. KOLBE, ET AL.,

Plaintiffs-Appellants

V.

LAWRENCE J. HOGAN, JR., GOVERNOR, ET AL.,

Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND AT BALTIMORE

**UNOPPOSED MOTION OF THE BRADY CENTER TO PREVENT GUN VIOLENCE
FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF
DEFENDANTS-APPELLEES' PETITION FOR REHEARING *EN BANC***

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COUNSEL FOR AMICUS CURIAE

February 25, 2016

Pursuant to Rules 27 and 29 of the Federal Rules of Appellate Procedure, the Brady Center to Prevent Gun Violence (“the Brady Center”) respectfully moves the Court for leave to file a brief as *amicus curiae* in support of the Defendants-Appellees’ petition for rehearing *en banc*. This motion is unopposed. All parties have consented to the filing of the Brady Center’s proposed *amicus curiae* brief, which has been filed separately on the docket in accordance with guidance from the Clerk’s Office of the U.S. Court of Appeals for the Fourth Circuit.

ARGUMENT

I. Interest of *Amicus Curiae*

The Brady Center is a non-profit organization dedicated to reducing gun violence through education, research, and legal advocacy. The Brady Center has a substantial interest in ensuring that state and federal gun laws are properly interpreted to prevent gun violence. Through its Legal Action Project, the Brady Center has filed numerous *amicus curiae* briefs in cases involving the interpretation of state and federal firearms laws. The Brady Center has particular expertise in the dangers of assault weapons and high-capacity magazines, having published several reports on this subject, including *Assault Weapons: Mass Produced Mayhem* (2008),¹ *On Target: The Impact of the 1994 Federal Assault*

¹ <http://www.bradycampaign.org/sites/default/files/mass-produced-mayhem.pdf> (accessed Feb. 24, 2016).

Weapon Act (2004),² and *Exporting Gun Violence: How Our Weak Gun Laws Arm Criminals in Mexico and America* (2009).³

II. Reasons Why Review of the Brief of *Amicus Curiae* Is Desirable and Why the Matters Asserted Are Relevant to the Disposition of the Case

The Brady Center has considerable expertise regarding gun violence and the dangers posed by firearms in a wide variety of contexts. This expertise is directly applicable to the significance of state regulations on, and the dangers posed by, assault weapons and high-capacity ammunition magazines. The Brady Center also has substantial expertise concerning the broader legal issues surrounding the licensing, transportation, possession, and use of firearms. This Court will benefit from the perspective and input of the Brady Center because the organization is well versed in the significance of the issues on appeal.

CONCLUSION

For the foregoing reasons, this Court should grant the Brady Center's unopposed motion for leave to file a brief as *amicus curiae* in support of Defendants-Appellees' petition for rehearing *en banc*.

² http://www.bradycampaign.org/sites/default/files/on_target.pdf (accessed Feb. 24, 2016).

³ http://www.bradycampaign.org/sites/default/files/exporting_gun_violence.pdf (accessed Feb. 24, 2016).

Respectfully submitted,

/s/ Amit R. Vora

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February 25, 2016

CERTIFICATE OF SERVICE

I certify that on February 25, 2016, the foregoing **Unopposed Motion of the Brady Center To Prevent Gun Violence For Leave To File *Amicus Curiae* Brief in Support of Defendants-Appellees' Petition For Rehearing *En Banc*** was served on all parties or their counsel of record through the CM/ECF system.

Dated: February 25, 2016

/s/ Amit R. Vora

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Attorney for Amicus Curiae