

NOT YET SCHEDULED FOR ORAL ARGUMENT

IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

Brian Wrenn, et al.,	)	No. 16-7025
	)	
Appellants,	)	
	)	
v.	)	
	)	
District of Columbia and	)	
Cathy Lanier, et al.,	)	
	)	
Appellees.	)	
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STATEMENT OF ISSUES

Appellants Brian Wrenn, Joshua Akery, Tyler Whidby, and Second Amendment Foundation, Inc., intend to raise the following issues on appeal:

1. Does the Second Amendment secure a fundamental right to carry handguns in public for self-defense?
2. May the City condition the issuance of handgun carry permits on proof of one's "good" or "proper" reason for exercising the fundamental right to bear arms, or otherwise license the right per the Police Chief's unbridled discretion?

3. Are Plaintiffs entitled to preliminary injunctive relief against Defendants' implementation of discretionary licensing regulations, in that (1) these regulations are at least likely unconstitutional; (2) plaintiffs are irreparably injured by denial of their permit applications; (3) the equities favor the granting of relief; and (4) an injunction would serve the public interest?

Dated: April 13, 2016

Respectfully submitted,

/s/ Alan Gura

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2016, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties/counsel of record by operation of the court's electronic filing system.

/s/ Alan Gura

Alan Gura

Counsel for Appellants