

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CASE NO.: 4:16-cv-40136-TJH

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PULLMAN ARMS INC., GUNS and GEAR, LLC,	)
PAPER CITY FIREARMS, LLC,	)
GRRR! GEAR, INC., and	)
NATIONAL SHOOTING SPORTS	)
FOUNDATION, INC.	)
	)
	)
Plaintiffs,	)
	)
v.	)
	)
	)
MAURA HEALEY, ATTORNEY GENERAL	)
FOR THE COMMONWEALTH OF	)
MASSACHUSETTS	)
	)
Defendant.	)

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**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE RESPONSE TO  
DEFENDANT'S SUPPLEMENTAL BRIEF**

The Plaintiffs request leave to file a response to the supplemental brief filed by the Defendant, Maura Healey, Attorney General for the Commonwealth of Massachusetts, on April 18, 2017. In that supplemental brief, the Defendant raised an entirely new argument in support of its Motion to Dismiss the Amended Complaint. Relying on a question raised at the April 7, 2017 hearing where the Court referred to redressability, the Defendant now argues, for the first time, that the Plaintiffs do not have standing to bring the complaint.

Because this argument was not raised before the supplemental brief, and the Plaintiffs

have standing, they propose to submit a short, four page memorandum addressing this new argument in the Defendants' supplemental brief.

PLAINTIFFS,

Pullman Arms Inc., Guns and Gear, LLC,  
Paper City Firearms, LLC, Grrr! Gear, Inc.,  
and National Shooting Sports Foundation,  
Inc.

By their attorneys,

/s/ David R. Kerrigan

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DATED: April 28, 2017

**CERTIFICATE OF SERVICE**

I hereby certify, on behalf of Plaintiffs, that on April 28, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ David R. Kerrigan

David R. Kerrigan

**CERTIFICATE OF COMPLIANCE WITH RULE 7.1**

I hereby certify that, pursuant to Local Rule 7.1(a)(2), I conferred with William W. Porter, Esq., counsel for Defendant, concerning this Motion by email exchanges beginning on April 27, 2017, and Attorney Porter indicated that the Defendant is not opposed to the allowance of this Motion, but the Defendant disputes the grounds set forth in the motion.

/s/ David R. Kerrigan  
David R. Kerrigan