

No. 12-17808

IN THE

In the United States Court of Appeals
for the Ninth Circuit

GEORGE K. YOUNG, JR.

Plaintiffs-Appellants,

v.

STATE OF HAWAII; *et al.*,

Defendant-Appellee.

On Appeal from the United States District Court
for the District of Hawaii
Helen W. Gillmor, Senior District Judge, Presiding

**MOTION OF BRADY
FOR LEAVE TO FILE BRIEF
AS *AMICUS CURIAE* OUT OF TIME**

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June 8, 2020

CORPORATE DISCLOSURE STATEMENT

Brady has no parent corporations. Brady also has no stock; therefore, no publicly held company owns 10% or more of its stock.

/s/ Mark M. Murakami

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Counsel for Amicus Curiae Brady

June 8, 2020

Pursuant to Rule 29(e) of the Federal Rules of Appellate Procedure, Brady respectfully moves this Court for leave to file the accompanying amicus curiae brief in support of Appellee State of Hawaii, and to file the brief out of time. This motion should be granted for the following reasons:

1. Both the Appellant and the Appellee have consented to Brady filing an amicus brief out of time.
2. Neither party will be prejudiced by this Court granting leave to Brady to file this amicus brief out of time.
3. Due to a calendaring error, counsel inadvertently failed to comply with the filing deadline, but has endeavored to correct that error in a timely fashion.
4. Brady has a strong interest in this case. The Court's disposition could impact Brady's current efforts supporting proposed firearms regulations in courts, communities, and state legislatures, as well as the interests of our grassroots supporters, many of whom have been harmed by gun violence and now advocate for Constitutional firearms regulation nationwide.
5. Brady can assist the Court by providing helpful analysis on issues that are central to the disposition of this appeal: the scope of the Second

Amendment right to keep and bear arms, the related public safety implications, and the interplay between the state of Hawaii's police powers and firearms regulations.

6. The accompanying brief conforms to the word limit imposed by the Court.

CONCLUSION

For the foregoing reasons, Brady requests that the Court grant this motion and accept the accompanying amicus brief for filing.

Respectfully Submitted,

/s/ Jonathan Lowy _____

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Defendants – Appellees..

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D.C. No. 1:12-cv-00336-HG-BMK
District of Hawaii,
Honolulu

PROPOSED ORDER

Amicus curiae Brady’s motion for leave to file an amicus brief out of time is granted. The clerk shall file the previously submitted amicus brief.