

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

NATIONAL SHOOTING SPORTS  
FOUNDATION, INC., BERETTA U.S.A.  
CORP., DAVIDSON'S, INC., GLOCK,  
INC., CENTRAL TEXAS GUN WORKS,  
HORNADY MANUFACTURING  
COMPANY, LIPSEY'S, LLC, OSAGE  
COUNTY GUNS LLC, RSR GROUP, INC.,  
SHEDHORN SPORTS, INC., SIG SAUER,  
INC., SMITH & WESSON INC., SPORTS  
SOUTH LLC, SPRAGUE'S SPORTS INC.  
and STURM, RUGER & COMPANY, INC.,

Plaintiffs,

v.

LETITIA JAMES, in her official capacity as  
New York Attorney General,

Defendant.

Case No.: 1:21-cv-1348 (MAD/CFH)

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Plaintiffs move this Court for an injunction preliminarily enjoining Defendant Letitia James, her officers, agents, and employees from enforcing N.Y. Gen. Bus. Law §§ 898-a–e against Plaintiffs. As explained in detail in the accompanying Memorandum of Law in support of this Motion, a preliminary injunction is warranted because Plaintiffs are likely to succeed on the merits of their claims, they will be irreparably harmed absent an injunction, the balance of the equities favor an injunction, and an injunction will be in the public interest.

Accordingly, based on this Motion, its accompanying Memorandum of Law, supporting declarations, and any other matters of record, Plaintiffs request this Court grant their motion for a preliminary injunction and enjoin Defendant from enforcing N.Y. Gen. Bus. Law §§ 898-a–e.

Dated: December 16, 2021

Respectfully submitted,

*/s/ Scott A. Chesin*

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*Counsel for all Plaintiffs*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was electronically filed with this Court's CM/ECF system on December 16, 2021, and accordingly served automatically upon all counsel of record for this matter.

*/s/ Scott A. Chesin*

Scott A. Chesin