IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROBERT C. BEVIS, et al.,

Plaintiffs,

v.

CITY OF NAPERVILLE, ILLINOIS, a municipal corporation,

Defendant.

No. 1:22-cv-04775

Honorable Virginia M. Kendall

DEFENDANT'S PARTIAL MOTION TO DISMISS THE COMPLAINT UNDER RULE 12(b)(1)

Pursuant to Federal Rule of Civil Procedure 12(b)(1), Defendant City of Naperville Illinois respectfully requests that the Court dismiss all claims by Plaintiff National Association for Gun Rights ("NAGR") because NAGR has failed to meet the requirements to establish associational standing. Further reasons in support of this Motion are set forth in the accompanying Memorandum.

Dated: November 28, 2022 By: <u>Christopher B. Wilson</u>
One of Their Attorneys

Christopher B. Wilson (No. 06202139)
Micaela Snashall (No. 6339703)
PERKINS COIE LLP
110 North Wacker Drive, Suite 3400
Chicago, Illinois 60606-1511
Telephone: +1.312.324.8400
CWilson@perkinscoie.com
MSnashall@perkinscoie.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that in accordance with Federal Rule of Civil Procedure 5 and Local Rule 5.5, the following document was served on November 28, 2022 through the district court's ECF system to the following counsel of record:

Jason Craddock Attorney at Law 2021 Midwest Rd., Ste 200 Oak Brook, IL 60523 craddocklaw@icloud.com

Barry K. Arrington Arrington Law Firm 3801 East Florida Avenue, Suite 830 Denver, Colorado 80210 barry@arringtonpc.com

s/ Micaela M. Snashall

Micaela Snashall
PERKINS COIE LLP
110 North Wacker Drive, Suite 3400
Chicago, Illinois 60606-1511
Phone: +1.312.324.8423
MSnashall@perkinscoie.com

Attorneys for Defendant CITY OF NAPERVILLE, ILLINOIS