

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DELAWARE STATE SPORTSMEN’S	:	
ASSOCIATION, INC; BRIDGEVILLE	:	
RIFLE & PISTOL CLUB, LTD.;	:	
DELAWARE RIFLE AND PISTOL CLUB;	:	Civil Action No.:
DELAWARE ASSOCIATION OF	:	1:22-cv-00951-RGA
FEDERAL FIREARMS LICENSEES;	:	
MADONNA M. NEDZA; CECIL CURTIS	:	
CLEMENTS; JAMES E. HOSFELT, JR;	:	
BRUCE C. SMITH; VICKIE LYNN	:	
PRICKETT; and FRANK M. NEDZA,	:	

Plaintiffs.

v.

DELAWARE DEPARTMENT OF	:	
SAFETY AND HOMELAND SECURITY;	:	
NATHANIAL MCQUEEN JR. in his	:	
official capacity as Cabinet Secretary,	:	
Delaware Department of Safety and	:	
Homeland Security; and COL. MELISSA	:	
ZEBLEY in her official capacity as	:	
superintendent of the Delaware State Police,	:	

Defendants.

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a) and the Local Rules of this District, Plaintiffs, Delaware State Sportsmen’s Association, Bridgeville Rifle and Pistol Club, Ltd., Delaware Rifle and Pistol Club, Delaware Association of Federal Firearms Licensees, Madonna M. Nedza; Cecil Curtis Clements; James E. Hosfelt, Jr.; Bruce C. Smith; Vickie Lynn Prickett; and Frank M. Nedza, hereby move this Court for a Preliminary Injunction barring Defendants, Delaware Department of Safety and Homeland Security; Secretary Nathaniel McQueen Jr., Cabinet Secretary of the Delaware Department of Safety and Homeland Security; and Col. Melissa

Zebley as the top law enforcement officer at the Delaware State Police as well as Defendants' officers, agents, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of the Order, from implementing or enforcing House Bill 450 codified at §§ 1464-1467 of title 11 of the Delaware Code, and Senate Substitute 1 for Senate Bill 6 codified at §§ 1441, 1468-1469A of title 11 of the Delaware Code, against Plaintiffs, its members, or their agents and licensees.

This Motion is based upon all the files, records, and proceedings herein, including the accompanying memorandum of law. Plaintiffs request that the Court require no security because the Defendants will suffer no injury from the issuance of a preliminary injunction.

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Dated: November 15, 2022.