

**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.

JOINT STIPULATION ON BRIEFING SCHEDULES

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 (collectively, “Plaintiffs”) and Defendants, Delaware Department of Safety and Homeland Security, Secretary Nathaniel McQueen Jr. in his official capacity as Cabinet Secretary, Delaware Department of Homeland Security, and Melissa Zebley, in her official capacity as Superintendent of the Delaware State Police (collectively, “Defendants”), by and through their respective undersigned counsel, hereby jointly agree to the following terms of this stipulation.

WHEREAS Plaintiffs and Defendants (collectively, “the Parties”), with guidance from this Honorable Court, seek to collaboratively reach agreement on an overall case management and scheduling order, including dates for hearings and/or a trial date;

WHEREAS the Parties have met to preliminarily discuss parameters of a proposed joint scheduling order and intend to seek input from the Court based upon these preliminary discussions;

WHEREAS in an effort to promote judicial efficiency, while in the process of discussing a joint scheduling order, the Parties stipulate to stay briefing on Defendants’ Partial Motion to Dismiss Plaintiffs’ Complaint (the “Motion to Dismiss”), and Plaintiffs’ Motion for Preliminary Injunction (the “Motion for Preliminary Injunction”);

THE PARTIES STIPULATE as follows:

1. Briefing on the Motion to Dismiss and Motion for Preliminary Injunction is stayed until such time as the Parties may agree or the Court may Order.

LEWIS BRISBOIS BISGAARD & SMITH
LLP

/s/ Francis G. X. Pileggi
Francis G.X. Pileggi (#2624)
Sean M. Brennecke (#4686)
500 Delaware Ave., Suite 700
Wilmington, DE 19801
302-985-6000
Francis.Pileggi@LewisBrisbois.com
Sean.Brennecke@LewisBrisbois.com

Attorneys for Plaintiffs

ROSS ARONSTAM & MORITZ LLP

David E. Ross (#5228)
Bradley R. Aronstam (#5129)
Garrett B. Moritz (#5646)
1313 North Market Street
Suite 1001
Wilmington, DE 19801
(302) 576-1600
dross@ramllp.com
baronstam@ramllp.com
gmoritz@ramllp.com

STATE OF DELAWARE DEPARTMENT
OF JUSTICE

/s/ Caneel Radinson-Blasucci
Kenneth L. Wan (#5667)
Caneel Radinson-Blasucci (#6574)
Deputy Attorneys General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400
kenneth.wan@delaware.gov
caneel.radinson-blasucci@delaware.gov

Attorneys for Defendants

Dated: November 22, 2022

IT IS SO ORDERED this ____ day of _____, 2022.

JUDGE RICHARD G. ANDREWS