

**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; 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,)

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.)

C.A. No. 1:22-cv-00951-RGA

GABRIEL GRAY; WILLIAM TAYLOR;)
DJJAMS LLC; FIREARMS POLICY)
COALITION, INC. and SECOND)
AMENDMENT FOUNDATION,)

Plaintiffs,)

v.)

KATHY JENNINGS, Attorney General of)
Delaware,)

Defendant.)

C.A. No. 1:22-cv-01500-MN

DEFENDANTS’ MOTION TO CONSOLIDATE

Pursuant to Federal Rule of Civil Procedure 42(a), Defendants Delaware Department of Safety and Homeland Security, Nathaniel McQueen, Jr., Melissa Zebley, and Kathy Jennings (“Defendants”) through their undersigned counsel, respectfully move this Court for an order consolidating the actions styled *Delaware State Sportsmen’s Association, Inc., et al. v. Delaware Department of Safety and Homeland Security, et al.*, C.A. No. 1:22-cv-00951-RGA, and *Gabriel Gray, et al. v. Kathy Jennings*, C.A. No. 1:22-cv-01500-MN, for all purposes. Defendants also request that papers in the consolidated action hereafter shall be filed and docketed solely on one of the existing dockets as determined by the Court. The grounds for this motion are set forth in the Opening Brief in Support of Defendants’ Motion to Consolidate, filed contemporaneously herewith. A proposed order and proposed consolidated caption are attached hereto.

ROSS ARONSTAM & MORITZ LLP

STATE OF DELAWARE DEPARTMENT
OF JUSTICE

/s/ David E. Ross

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

/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: December 4, 2022