

**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  
(Consolidated)

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

Plaintiffs,

v.

KATHY JENNINGS, Attorney General of  
Delaware,

Defendant.

CHRISTOPHER GRAHAM, OWEN  
STEVENS; FIREARMS POLICY  
COALITION, INC., and SECOND  
AMENDMENT FOUNDATION,

Plaintiffs,

v.

KATHY JENNINGS, Attorney General of the  
State of Delaware,

Defendant.

C.A. No. 23-00033-RGA

**STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE CASES**

WHEREAS, on January 12, 2023, Plaintiffs filed a Complaint (D.I. 1) initiating the above-captioned action styled *Christopher Graham, et al. v. Kathy Jennings, Attorney General of the State of Delaware*, C.A. No. 23-00033-RGA (the “Graham Action”);

WHEREAS, Plaintiffs in the Graham Action bring claims challenging 11 *Del. C.* §§ 1441, 1468-1469A (“SS 1 for SB 6”);

WHEREAS, the Court is currently considering challenges to SS1 for SB 6 brought by plaintiffs in the consolidated action captioned *Delaware State Sportsmen's Association, Inc. et al. v. Delaware Department of Safety and Homeland Security et al.*, C.A. No. 22-00951-RGA (the “DSSA Action”); and

WHEREAS, the parties to the DSSA Action agree that the Graham Action presents common questions of law and fact such that consolidation of the Actions would promote judicial economy by preventing inconsistent rulings and duplication of efforts;

**IT IS HEREBY STIPULATED AND AGREED**, by the parties to the DSSA and Graham Actions, subject to the approval of the Court, that:

1. The Graham Action is hereby CONSOLIDATED with the DSSA Action for all purposes, including trial.

2. All documents filed in the consolidated action hereafter shall be filed and docketed solely in the case bearing the civil action number listed below, and all filings shall bear the consolidated caption appearing below:

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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.	)	
	)	C.A. No. 1:22-cv-00951-RGA
DELAWARE DEPARTMENT OF SAFETY	)	(Consolidated)
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.	)	

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

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v.

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Delaware,

Defendant.

CHRISTOPHER GRAHAM, OWEN  
STEVENS; FIREARMS POLICY  
COALITION, INC., and SECOND  
AMENDMENT FOUNDATION,

Plaintiffs,

v.

KATHY JENNINGS, Attorney General of the  
State of Delaware,

Defendant.

GELLERT SCALI BUSENKELL  
& BROWN, LLC

LEWIS BRISBOIS BISGAARD  
& SMITH LLP

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OF JUSTICE

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*Attorneys for Defendants*

Dated: March 3, 2023

**IT IS SO ORDERED** this 6th day of March 2023.

/s/ Richard G. Andrews

THE HONORABLE RICHARD G. ANDREWS  
U.S. DISTRICT JUDGE