

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

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| CALEB BARNETT et al.,<br>Plaintiffs,<br>v.<br>KWAME RAOUL et al.,<br>Defendants.  | No. 3:23-cv-00209-SPM (lead case) |
| DANE HARREL et al.,<br>Plaintiffs,<br>v.<br>KWAME RAOUL et al.,<br>Defendants.  | No. 3:23-cv-00141-SPM             |
| JEREMY W. LANGLEY et al.,<br>Plaintiffs,<br>v.<br>BRENDAN KELLY et al.,<br>Defendants.                                      | No. 3:23-cv-00192-SPM             |
| FEDERAL FIREARMS LICENSEES OF<br>ILLINOIS et al.,<br>Plaintiffs,<br>v.<br>JAY ROBERT "J.B." PRITZKER et al.,<br>Defendants. | No. 3:23-cv-00215-SPM             |

**JOINT RESPONSE AND STIPULATION REGARDING MONEY DAMAGES CLAIMS**

Plaintiffs Dane Harrel, C4 Gun Store, LLC, Marengo Guns, Inc., Illinois State Rifle Association, Firearms Policy Coalition, Inc., and Second Amendment Foundation (“*Harrel* plaintiffs”); Jeremy W. Langley, Timothy B. Jones, and Matthew Wilson (“*Langley* plaintiffs”); Caleb Barnett, Brian Norman, Hood’s Guns & More, Pro Gun and Indoor Range, and National Shooting Sports Foundation, Inc. (“*Barnett* plaintiffs”); Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Debra Clark, Jasmine Young, and Chris Moore (“*FFL* plaintiffs”); and Defendants JB Pritzker, Kwame Raoul, and Brendan Kelly (“State defendants”) respectfully submit this joint response and stipulation regarding the Court’s inquiry “whether the amount to award in money damages is a question that is to be decided by a jury, should the Plaintiffs’ challenge to PICA be successful in whole or in part.” ECF 166 at 15.

1. The *Harrel* plaintiffs and *Langley* plaintiffs confirm they have sued the State defendants in their official capacities only and therefore are not seeking any money damages.

2. The *Barnett* plaintiffs confirm they have sued the State defendants in both their official and individual capacities and are seeking nominal damages in the amount of \$1 against the State defendants in their individual capacities. There is no statutory or constitutional right to a jury trial on the *Barnett* plaintiffs’ nominal damages claim in the amount of \$1. The *Barnett* plaintiffs confirm they are not asserting any other money damages claims against the State defendants.

3. The *FFL* plaintiffs confirm they have sued the State defendants in their official capacities only and therefore withdraw any money damages claims previously asserted against the State defendants.

SO STIPULATED:

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