

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

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| CALEB BARNETT, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants. | Case No. 3:23-cv-209-SPM ** designated Lead Case |
| DANE HARREL, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants. | Case No. 3:23-cv-141-SPM |
| JEREMY W. LANGLEY, <i>et al.</i> , Plaintiffs, vs. BRENDAN KELLY, <i>et al.</i> , Defendants. | Case No. 3:23-cv-192-SPM |
| FEDERAL FIREARMS LICENSEES OF ILLINOIS, <i>et al.</i> , Plaintiffs, vs. JAY ROBERT "JB" PRITZKER, <i>et al.</i> , Defendants. | Case No. 3:23-cv-215-SPM |

**PLAINTIFFS' IDENTIFICATION OF MATERIALS
FOR POST-TRIAL SUBMISSIONS**

Plaintiffs, by undersigned counsel, identify the following materials that they may cite in their post-trial submissions, i.e., proposed Findings of Fact and Conclusions of Law, which are currently due thirty (30) days after the close of the live testimony trial scheduled to begin on September 16, 2024. The purpose of this disclosure is to identify additional materials on which the Court may base its ultimate findings, aside from those materials that are already entered onto the record in this case via the Court's ECF/CM docket and/or are anticipated to be entered onto the record as part of the upcoming trial. Plaintiffs have not included statutes, cases, or other similar

sources, but Plaintiffs of course reserve the right to cite such sources in any post-trial submission.

Based upon information presently and reasonably available to Plaintiffs, the following materials are those that Plaintiffs may use to support their claims and/or rebut the Defendants' positions advanced in the parties' post-trial submissions. All of these materials relate to "legislative facts" over which this Court's review is not limited by the Federal Rules of Evidence. *See* Fed. R. Evid. 201, 1972 Advisory Committee Note. The materials listed below include citations to access the materials at publicly available databases, and hyperlinks where available. The parties have also exchanged many of these materials in discovery if not easily accessible online.

Finally, Plaintiffs have not received a list of legislative facts from the Defendants for their post-trial submissions, and thus Plaintiffs reserve the right to object to all or part of Defendants' list, supplement this submission, and/or respond with additional legislative facts as part of the post-trial submissions.

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Books

1. *Gun Digest*¹
2. *The Shooter's Bible, the World's Bestselling Firearms Reference*²

¹ *Gun Digest* is updated regularly and publicly available in many editions. The Plaintiffs have already identified such material on their Exhibit List for trial.

² *The Shooter's Bible* is updated regularly and is publicly available in many editions, including, for instance here, <https://archive.org/details/shootersbible1090000unse/mode/2up>.

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