

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

CALEB BARNETT, et al.,	)	Case No. 3:23-cv-209-SPM
Plaintiffs,	)	**designated Lead Case
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
DANE HARREL, et al.,	)	Case No. 3:23-cv-141-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
JEREMY W. LANGLEY, et al.,	)	Case No. 3:23-cv-192-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
BRENDAN KELLY, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
<b>FEDERAL FIREARMS LICENSEES OF</b>	)	<b>Case No. 3:23-cv-215-SPM</b>
<b>ILLINOIS, et al.,</b>	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	
	)	
<b>JAY ROBERT “J.B.” PRITZKER, et al.,</b>	)	
<b>Defendants.</b>	)	
<hr/>	)	

**PLAINTIFFS’ SUBMISSION OF WRITTEN TESTIMONY**

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”); and Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Jasmine Young, and Chris Moore (“*FFL* plaintiffs”) (together, “Plaintiffs”), by undersigned counsel, and pursuant to the Court’s directive at the Pre-Trial Conference of September 9, 2024, submit the following: Transcripts (including errata sheets) of depositions with corresponding exhibits of witnesses who were deposed in the above-captioned matter; and declarations from all of the Plaintiffs’ expert witnesses who submitted reports in this matter.

The following transcripts with errata sheets, if any, and corresponding exhibits are included:

1. Deposition Transcript of Scott Pulaski
2. Deposition Transcript of Paul Leitner-Wise
3. Deposition Transcript of Jeffrey Eby
4. Deposition Transcript of James Ronkainen
5. Deposition Transcript of Steven R. Watt
6. Deposition Transcript of Salam Fatohi
7. Deposition Transcript of Jim Curcuruto

The following declarations from Plaintiffs’ experts who submitted reports in this matter are included:

8. Declaration of Stephen Helsley
9. Declaration of Michael Musselman
10. Declaration of J. Buford Boone
11. Declaration of Paul Leitner-Wise
12. Declaration of Jeffrey Eby
13. Declaration of Matthew Little
14. Declaration of James Ronkainen

15. Declaration of David Lombardo

16. Declaration of Steven R. Watt

Dated: September 13, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2024, an electronic PDF of **PLAINTIFFS'**  
**SUBMISSION OF WRITTEN TESTIMONY** was electronically filed with the Clerk of the  
District Court using its ECF System, which electronically notifies all counsel of record.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 13, 2024

*s/ Laura Palmerin*

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Laura Palmerin