

IN THE UNITED STATES COURT OF APPEALS  
FOR THE SEVENTH CIRCUIT

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Nos. 24-3060, 24-3061, 24-3062, 24-3063

CALEB BARNETT; BRIAN NORMAN; HOOD'S GUNS & MORE; PRO GUN  
AND INDOOR RANGE; NATIONAL SHOOTING SPORTS FOUNDATION,  
INC.

Plaintiffs-Appellees

v.

KWAME RAOUL, Attorney General of the State of Illinois; BRENDAN F.  
KELLY, Director of the Illinois State Police,

Defendants-Appellants

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF ILLINOIS  
Case Nos. 3:23-cv-209, 3:23-cv-141, 3:23-cv-192, 3:23-cv-215  
The Honorable Judge Stephen P. McGlynn

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**UNOPPOSED MOTION OF THE UNITED STATES AS *AMICUS CURIAE*  
TO PARTICIPATE IN ORAL ARGUMENT**

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Pursuant to Federal Rules of Appellate Procedure 27 and 29(a)(8), the  
United States respectfully seeks permission to participate in oral argument of this  
appeal on five minutes of time ceded by plaintiffs-appellees. In support of this  
motion, the United States provides as follows:

1. On June 13, 2025, the United States filed its brief as *amicus curiae* supporting plaintiffs-appellees and affirmance pursuant to Federal Rule of Appellate Procedure 29(a)(2).
2. On June 30, 2025, this Court scheduled this case for oral argument on September 22, 2025.
3. This appeal concerns whether Illinois’s Protect Illinois Communities Act, which prohibits so-called “assault weapons,” can withstand scrutiny under the Second Amendment, which protects Americans’ right to “keep and bear Arms.” Because of the federal government’s interest in “protect[ing] the Second Amendment rights of all Americans,” Executive Order No. 14,206, *Protecting Second Amendment Rights*, 90 Fed. Reg. 9503 (Feb. 7, 2025), the United States filed a brief as *amicus curiae* supporting Plaintiffs-Appellees. The United States believes that its participation in oral argument will be helpful to the Court.
4. If the Court grants this motion, the Assistant Attorney General for the Civil Rights Division of the Department of Justice, Harmeet K. Dhillon, will present oral argument on behalf of the United States.
5. This Court’s calendar currently indicates that the Court has allotted 45 minutes of argument time to defendants-appellants and 45 minutes to plaintiffs-appellees.

6. Counsel for plaintiffs-appellees consent to this motion and have agreed to cede five minutes of their oral argument time to the United States if this motion is granted. As a result, the United States' participation in oral argument will not affect the overall time allotted for this case.

7. Counsel for defendants-appellants does not oppose this motion.

### CONCLUSION

For the foregoing reasons, the United States respectfully requests leave to participate in oral argument with five minutes of time ceded by plaintiffs-appellees.

Respectfully submitted,

HARMEET K. DHILLON  
Assistant Attorney General

JESUS A. OSETE  
Principal Deputy Assistant Attorney  
General

s/ Andrew G. Braniff  
ANDREW G. BRANIFF  
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Date: September 3, 2025

## CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 313 words, excluding the parts of the motion exempted by Federal Rule of Appellate Procedure 32(f). This motion also complies with the typeface and type-style requirements of Federal Rules of Appellate Procedure 27(d)(1)(E) and 32(a)(5) and (6) because it was prepared in Times New Roman 14-point font using Microsoft Word for Microsoft 365.

s/ Andrew G. Braniff  
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ANDREW G. BRANIFF  
Attorney

Date: September 3, 2025