

JANE DOE, et al.,

Plaintiffs,

v.

COL. MARCUS L. BROWN, in his official capacity as Secretary of the Department of State Police and Superintendent of the Maryland State Police, et al.,

Defendants.

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IN THE
CIRCUIT COURT FOR
BALTIMORE COUNTY

Case No. _____

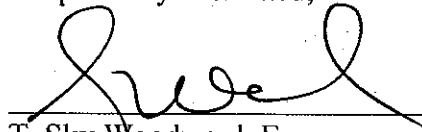
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MOTION FOR EXPEDITED TREATMENT

Plaintiffs Jane Doe, Carol Doe, Emily Doe, Mary Doe, and John Doe, Maryland Licensed Firearm Dealers Association (“MLFDA”), Associated Gun Clubs of Baltimore, Inc. (“AGC”), and Maryland Shall Issue, Inc. (“MSI”) (collectively, “Plaintiffs”), by and through undersigned counsel, respectfully request that this Court review and process this action in expedited fashion. In support of their Motion, Plaintiffs state that this action concerns the impermissible burden and delay caused to the fundamental constitutional rights of Plaintiffs Jane Doe, Carol Doe, Emily Doe, Mary Doe, John Doe, and the individual members of Plaintiffs AGC and MSI to purchase and keep firearms for purposes of self-defense in their homes as guaranteed by the Second Amendment to the United States Constitution by Defendants’ failure to comply with their statutory duty to issue all notices regarding disapproval of firearm applications within 7 days after the date such applications are forwarded to the Secretary of the Maryland State Police. In addition, Defendants’ actions cause MLFDA’s individual members significant economic injury, insofar as these entities are required to own or purchase the regulated firearms at the time that applications are submitted but may not complete transfers of such firearms (and therefore receive

payment in full for such firearms) until Defendants issue notices regarding disapproval of such applications, resulting in these entities having many thousands of dollars in inventory tied up for months at a time while awaiting receipt of notices regarding disapproval from Defendants. Similarly, these entities have observed that the delay between the date their purchasers submit applications and the date the Maryland State Police issue notices regarding disapproval of such applications, at which time these entities may transfer the firearms to the purchasers without fear of civil or criminal penalties or sanctions, has led many purchasers to cancel orders and/or engage in purchases in other jurisdictions, resulting in lost sales and revenue. In light of the nature of this action, expedited treatment is warranted.

Respectfully submitted,



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Mary Doe, John Doe, Maryland Licensed Firearm Dealers
Association, Inc., Associated Gun Clubs of Baltimore, Inc.,
and Maryland Shall Issue, Inc.*

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* * * * *

(PROPOSED) ORDER

Upon consideration of Plaintiffs' Motion for Expedited Treatment, and any Opposition thereto, it is hereby ORDERED this __ day of _____, 2013, that Plaintiffs' Motion is GRANTED. Thus, this case will be reviewed and processed in expedited fashion.

Judge, Circuit Court for Baltimore County

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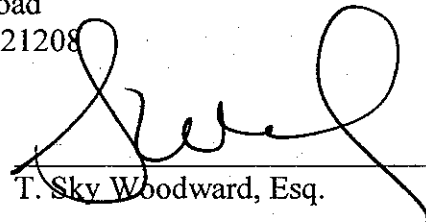
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of May, 2013, copies of this Motion for Expedited Treatment and Proposed Order were served, by hand-delivery, on the following:

Office of the Attorney General
Douglas F. Gansler
Attorney General
200 St. Paul Place
Baltimore, Maryland 21202

Office of the Attorney General
Mark H. Bowen
Assistant Attorney General
1201 Reisterstown Road
Pikesville, Maryland 21208



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