

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RONALD KOONS, *et al.*

Plaintiffs

v.

WILLIAM REYNOLDS, *et al.*

Defendants

AARON SIEGEL, *et al.*

Plaintiffs,

v.

MATTHEW PLATKIN, *et al.*

Defendants.

)
) Civil Action No. 1:22-cv-07464-RMB-AMD

CIVIL ACTION

(ELECTRONICALLY FILED)

CONSOLIDATED ACTIONS

NOTICE OF EMERGENCY MOTION OF SIEGEL PLAINTIFFS TO REINSTATE CASE TO ACTIVE CALENDAR SO THAT SIEGEL PLAINTIFFS MAY FILE TWO NEW MOTIONS:

(1) TO AMEND COMPLAINT TO ASSERT NEW CLAIMS CHALLENGING NEW UNCONSTITUTIONAL MANDATORY HANDGUN QUALIFICATION REQUIREMENT RELEASED ON JULY 18, 2023; AND

(2) FOR NEW TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION ENJOINING THE UNCONSTITUTIONAL REQUIREMENT

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PLEASE TAKE NOTICE, that on a date to be determined by the Court, the *Siegel* plaintiffs, shall move on an EMERGENCY basis before the Honorable Renee M. Bumb, U.S.D.J., at the United States Courthouse, Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets, Camden, NJ 08101, for an Order reinstating the case to the active calendar so they may file two new motions as follows:

- (1) to amend the Complaint to assert new claims challenging a new unconstitutional mandatory handgun qualification requirement released by Defendant Superintendent of State Police Patrick Callahan on July 18, 2023; and
- (2) for a new temporary restraining order and preliminary injunction enjoining enforcement of the unconstitutional requirement.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiffs shall rely upon the Declaration of Daniel L. Schmutter.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: July 26, 2023

Respectfully submitted,

s/ Daniel L. Schmutter
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