

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
San Angelo Division**

SILENCER SHOP FOUNDATION; GUN OWNERS OF AMERICA, INC; FIREARMS REGULATORY ACCOUNTABILITY COALITION, INC.; B&T USA, LLC; PALMETTO STATE ARMORY, LLC; SILENCERCO WEAPONS RESEARCH, LLC (d/b/a SILENCERCO); GUN OWNERS FOUNDATION; BRADY WETZ; STATE OF TEXAS; STATE OF ALASKA; STATE OF GEORGIA; STATE OF IDAHO; STATE OF INDIANA; STATE OF KANSAS; STATE OF LOUISIANA; STATE OF MONTANA; STATE OF NORTH DAKOTA; STATE OF OKLAHOMA; STATE OF SOUTH CAROLINA; STATE OF SOUTH DAKOTA; STATE OF UTAH; STATE OF WEST VIRGINIA; and STATE OF WYOMING,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES; UNITED STATES DEPARTMENT OF JUSTICE; PAMELA BONDI, in her Official Capacity as ATTORNEY GENERAL OF THE UNITED STATES; and DANIEL DRISCOLL, in his Official Capacity as ACTING DIRECTOR OF THE BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES,

Defendants.

Case No. 6:25-cv-56-H

PLAINTIFFS' MOTION FOR SUMMARY JUDGEMENT

Plaintiffs Silencer Shop Foundation, Gun Owners of America, Inc. ("GOA"), Firearms Regulatory Accountability Coalition, Inc. ("FRAC"), B&T USA, LLC, Palmetto State Armory, LLC, SilencerCo Weapons Research, LLC ("SilencerCo"), Gun Owners Foundation ("GOF"),

Brady Wetz, State of Texas, State of Alaska, State of Georgia, State of Idaho, State of Indiana, State of Kansas, State of Louisiana, State of Montana, State of North Dakota, State of Oklahoma, State of South Carolina, State of South Dakota, State of Utah, State of West Virginia, and State of Wyoming, by counsel, respectfully move for an Order granting their Motion for Summary Judgement on Counts I, II, and II of their Amended Complaint (ECF No. 15), pursuant to Rule 56 of Civil Procedure and Local Rule 56.3.

This Motion is supported by Plaintiffs' Memorandum in Support of their Motion for Summary Judgement, which sets forth the argument and authorities on which Plaintiffs rely and contain the materials required by Local Rule 56.3.

Dated: October 7, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 7, 2025, and that all counsel of record were served by CM/ECF.

/s/ Stephen D. Stamboulieh

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