

Civil Action No. 6:20-cv-01438

See, e.g. Americans for Prosperity Foundation v. Bonta, 594 U.S. 595, 606 (2021).

4. To be clear, Plaintiffs do not concede that altering the Judgment in this way would make its scope appropriate, and Plaintiffs retain their right to challenge all aspects of the Judgment on appeal. However, in the absence of the proposed amendment, Plaintiffs face an imminent deadline compelling the disclosure of their membership information.
5. To avoid the need for Plaintiffs to file an emergency motion to stay the disclosure deadline, the Parties respectfully request that the Court act on this motion by October 14, 2025.

Dated: October 10, 2025

Respectfully submitted,

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

CALEB REESE, ET AL.

CASE NO. 6:20-CV-01438

VERSUS

JUDGE ROBERT R. SUMMERHAYS

**BUREAU OF ALCOHOL TOBACCO
FIREARMS & EXPLOSIVES, ET AL.**

MAGISTRATE JUDGE WHITEHURST

[PROPOSED] AMENDED JUDGMENT

In accordance with the Fifth Circuit's decision in *Reese v. Bureau of Alcohol, Tobacco, Firearms, and Explosives*, 127 F.4th 583 (5th Cir. 2025):

1. Judgment is entered for Plaintiffs on Count I of the operative complaint.
2. The Court enters declaratory judgment, as described in paragraph 3 below, with respect to (a) Caleb Reese, Joseph Granich, Emily Naquin, and (b) individuals and federally licensed firearms importers, manufacturers, dealers or collectors who were members of Firearms Policy Coalition, Inc., Second Amendment Foundation, or Louisiana Shooting Association at the time this action was filed on November 6, 2020 and who are identified by Plaintiffs pursuant to paragraph 5.
3. The Court hereby declares that 18 U.S.C. §§ 922(b)(1) and (c)(1), and their attendant regulations, are unconstitutional and violate the Second Amendment to the United States Constitution to the extent those provisions prevent the sale or delivery of handguns and/or handgun ammunition by and to persons identified in paragraph 2 on account of the buyer being 18 to 20 years old.
4. The Bureau of Alcohol, Tobacco, Firearms and Explosives, its Director, the Attorney General of the United States, and their officers, agents, servants, employees, and all persons in active concert with them and who have actual notice of this Judgment are

hereby enjoined, within the jurisdictional boundaries of the United States Court of Appeals for the Fifth Circuit (*i.e.*, Mississippi, Louisiana, and Texas), from enforcing the provisions referenced in paragraph 3, to the extent those provisions prevent the sale or delivery of handguns and/or handgun ammunition by and to persons identified in paragraph 2 on account of the buyer being 18 to 20 years old.

5. Within twenty-one (21) days of issuance of this Judgment, those Plaintiffs identified at paragraph 2(b) may provide to Defendants a verified list of their members as of November 6, 2020.
6. Count II of the operative complaint is moot and dismissed without prejudice.
7. The parties shall bear their own costs and fees.

THUS DONE in Chambers on this ____th day of October, 2025.

ROBERT R. SUMMERHAYS
UNITED STATES DISTRICT JUDGE