

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

No. 25-1918

STEFANO GRANATA; THE GUN RUNNER, LLC; FIREARMS POLICY
COALITION, INC.; CAMERON PROSPERI,

Plaintiffs-Appellants

JUDSON THOMAS; COLBY CANNIZZARO,

Plaintiffs

v.

ANDREA J. CAMPBELL, in the official capacity as Attorney General of the
Commonwealth of Massachusetts; TERRENCE M. REIDY, in the official capacity
as Secretary of the Executive Office of Public Safety and Security of the
Commonwealth of Massachusetts,

Defendants-Appellees

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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

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-appellants. In support, the United States provides as follows:

1. This appeal concerns the fundamental right of law-abiding citizens to acquire, possess, and carry arms in common use for lawful purposes guaranteed by the Second Amendment. Massachusetts law infringes upon this fundamental right by effectively establishing a preclearance regime for the sale of widely owned and commonly used handguns, which prevents or unlawfully restricts law-abiding Massachusetts citizens from purchasing those arms. This regime indirectly achieves what *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1, 70 (2022) forbids: “prohibit[ing] the public carry of commonly used firearms for personal defense.”

2. The United States has a strong interest in ensuring important questions about the scope of the Second Amendment’s protections are correctly resolved, that the Second Amendment is not treated as a second-class right, and that law-abiding Americans in this Circuit are not deprived of the full opportunity to enjoy the exercise of their Second Amendment rights.

3. Because of those strong interests, on January 28, 2026, the United States filed its brief as amicus curiae supporting plaintiffs-appellants and urging reversal pursuant to Federal Rule of Appellate Procedure 29(a)(2).

4. On July 22, 2026, this Court scheduled this case for oral argument on September 9, 2026.

5. The United States submits that its participation in oral argument will be helpful to the Court in resolving the important constitutional question presented.

6. If the Court grants this motion, the Assistant Attorney General for the Civil Rights Division of the Department of Justice, Harmeet K. Dhillon, would present oral argument on behalf of the United States. A motion for leave to file notice of appearance on behalf of the United States pursuant to Local Rule 12.0(a) has been filed contemporaneously with this motion.

7. Counsel for plaintiffs-appellants consents to this motion and has 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 would not affect the overall time allotted for this case.

8. Counsel for defendants-appellees advised that defendants-appellees take no position on 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-appellants.

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

JESUS A. OSETE
Principal Deputy Assistant
Attorney General
Civil Rights Division

BARRY ARRINGTON
Acting Chief
Second Amendment Section
Civil Rights Division

s/ Andrew G. Braniff
ANDREW G. BRANIFF
Attorney
Department of Justice
Civil Rights Division
Appellate Section
Ben Franklin Station
P.O. Box 14403
Washington, D.C. 20044-4403
(202) 532-3803

Dated: August 5, 2026

CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 411 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
ANDREW G. BRANIFF
Attorney

Date: August 5, 2026