

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BONITA SHREVE; GUN OWNERS OF
AMERICA, INC.; and GUN OWNERS
FOUNDATION,

Plaintiffs,

v.

UNITED STATES POSTAL SERVICE;
DOUG TULINO, in his official capacity as
U.S. Postmaster General; UNITED STATES
POSTAL INSPECTION SERVICE; GARY
BARKSDALE, in his official capacity as Chief
Postal Inspector; and UNITED STATES
DEPARTMENT OF JUSTICE,

Defendants.

Hon. Stephanie L. Haines, U.S.D.J.

Civil Action No. 3:25-cv-00214

MOVANT STATES' MOTION TO INTERVENE

Undersigned counsel for the States of Delaware, New Jersey, and New York ("Movant States") hereby move before this Court for an Order granting Movant States leave to intervene as defendants under Fed. R. Civ. P. 24, for the purpose of providing arguments in support of the constitutionality of 18 U.S.C. § 1715, the federal statute challenged in this case.

The grounds for intervention are set forth in the accompanying Memorandum of Law and Declarations of Colonel William Crotty, Eric Barlow, and Michael Deyo. A proposed order is attached, along with Movant States' proposed Answer and combined Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment with exhibits.

Dated: March 2, 2026

Respectfully submitted,

KATHLEEN JENNINGS
Attorney General of Delaware

JENNIFER DAVENPORT
Attorney General of New Jersey

By: /s/ Ian R. Liston
Ian R. Liston*
Jennifer Kate Aaronson*
Deputy Attorneys General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
(302) 683-8875
ian.liston@delaware.gov
jennifer.aaronson@delaware.gov

By: /s/ Meghan K. Musso
Meghan K. Musso*
Deputy Attorney General
124 Halsey Street, 5th Floor
Newark, New Jersey 07101
(609) 696-5276
Meghan.musso@law.njoag.gov

Counsel for the State of New Jersey

Counsel for the State of Delaware

LETITIA JAMES
Attorney General of the State of New York

By: /s/ James Thompson
James M. Thompson*
Special Counsel for Second Amendment
Litigation
Molly Thomas-Jensen*
Special Counsel
Danny Yao Li**
Assistant Solicitor General
28 Liberty St.
New York, New York 10005
(212) 416-8679
james.thompson@ag.ny.gov
molly.thomas-jensen@ag.ny.gov
danny.li@ag.ny.gov

Counsel for the State of New York

* Admitted *pro hac vice*

** *Pro hac vice* application forthcoming

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the 2nd day of March, 2026, I caused the foregoing documents to be served via electronic filing on lead counsel of record.

/s/ Meghan K. Musso
Meghan K. Musso
Deputy Attorney General