

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

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

*Plaintiffs,*

-against-

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,*

STATE OF DELAWARE, STATE OF NEW JERSEY  
and STATE OF NEW YORK,

*Intervenors.*

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**STATES' PROPOSED NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the accompanying response to Plaintiffs' statement of material facts, the accompanying declaration of James M. Thompson, with exhibits, and upon all prior proceedings, intervenors State of Delaware, State of New Jersey, and State of New York (the "States") will move this Court before the Honorable Stephanie L. Haines, United States District Judge, for an order denying Plaintiffs' motion for summary judgment, granting summary judgment in favor of Defendants and the States, and granting such other and further relief as the Court deems just and proper. A proposed order is attached.

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

Civil Action No. 3:25-cv-00214

Dated: March 2, 2026

Respectfully submitted,

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**JENNIFER DAVENPORT**  
Attorney General of New Jersey

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\*\* *Pro hac vice* application forthcoming