

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

WILLIAM DRUMMOND, GPGC LLC, and ) Civil Action No. 18-1127-MRH  
SECOND AMENDMENT FOUNDATION, INC., )  
 ) **PLAINTIFFS' MOTION FOR**  
Plaintiffs, ) **PRELIMINARY INJUNCTION**  
 )  
v. ) **Fed. R. Civ. P. 65**  
 )  
ROBINSON TOWNSHIP and MARK DORSEY, )  
Robinson Township Zoning Officer, in his official )  
and individual capacities, )  
 )  
Defendants. )  
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**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Plaintiffs William Drummond, GPGC LLC, and Second Amendment Foundation, Inc., respectfully move this Honorable Court to preliminarily enjoin Defendants Robinson Township and Mark Dorsey from enforcing Robinson Township Zoning Ordinance Sections 311(D) and 601, and Table 208A, against their operation and enjoyment of the gun club located at 920 King Road, Bulger, Pennsylvania 15019; and further commanding that Defendants issue forthwith all permits necessary for the operation of said gun club to which William Drummond would be entitled in the absence of the Township's adoption of Ordinance 1-2018.

Counsel for Plaintiffs Mr. McCune has met and conferred with Defendants over the filing of this motion, and has advised that such relief would be sought. Counsel for Defendants have not agreed to the relief sought.

Dated: September 21, 2018

Respectfully submitted,

/s/ Alan Gura

Alan Gura (VA Bar No. 68842)  
Gura PLLC  
916 Prince Street, Suite 107  
Alexandria, VA 22314  
703.835.9085/Fax 703.997.7665  
*Admitted pro hac vice*

/s/ James H. McCune

James H. McCune (PA Bar No. 19852)  
/s/ K. Bradley Mellor  
K. Bradley Mellor (PA Bar No. 61363)  
Bowles Rice  
1800 Main Street, Suite 200  
Cannonsburg, PA 15317  
724.514.8938/Fax 724.514.8954

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September, 2018 a copy of the foregoing motion, supporting documentation and proposed order were electronically served upon all parties by filing the same with the Clerk of Court using the CM/ECF system and forwarding to all counsel of record.

/s/ Alan Gura  
Alan Gura