

Case 15-50759

DEFENSE DISTRIBUTED, *et al.*,

Plaintiffs-appellants,

v.

UNITED STATES DEPT. OF

STATE, *et al.*,

Defendants-appellees.

U.S. Court of Appeals

for the Fifth Circuit

**Motion of the Madison Society Foundation, Inc.,  
for Leave to File Brief as *Amicus Curiae*  
in Support of Plaintiffs-Appellants**

The Madison Society Foundation, Inc., moves for leave to file a brief as *amicus curiae* in support of the plaintiffs-appellants. The parties consent to this motion. A copy of the proposed brief is attached.

**A. Interest of amicus.**

The Madison Society Foundation is a not-for-profit 501(c)(3) corporation based in California. It promotes and preserves the purposes of the Constitution of the United States, in particular the right to keep and bear arms.

**B. Amicus's relevance to the case.**

The Framers understood the right to bear arms to encompass not just the ability to use arms, but the ability to construct them. The Foundation comes as a friend of the Court to explain how this understanding should inform the Court's analysis of the arms regulations challenged by the plaintiffs and how affirming those restrictions would diminish the rights protected by the First and Second Amendments.

**C. Conclusion and prayer.**

The Madison Society Foundation prays that the Court grant it leave to file its attached brief as a friend of the Court supporting the plaintiffs-appellants. They further pray for all other relief to which they may be entitled.

Respectfully submitted,

/s/ Leif A. Olson

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**Certificate of Conference**

I certify that I conferred with counsel for the parties, who informed me that they don't oppose this motion.

/s/ David T. Hardy

**Certificate of Service**

I certify that on December 17, 2015, I served this *Motion of the Madison Society Foundation, Inc., for Leave to File Brief as Amicus Curiae in Support of Plaintiffs-Appellants* on all counsel of record through the Court's CM/ECF system.

/s/ Leif A. Olson