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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

**CALEB REESE *et al.*,**

Plaintiffs,

v.

**THE BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES *et al.*,**

Defendants.

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: Civil Action No. 6:20-cv-01438  
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**STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT  
OF PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Civil Rule 56.1, Plaintiffs submit this statement of undisputed material facts in support of their motion for partial summary judgment, filed concurrently:

1. Plaintiff Naquin is a resident of Louisiana, over eighteen, but younger than twenty-one years old. She has never been charged with or convicted of any offense that would prevent her from purchasing a handgun under all applicable laws. Nothing except her age prevents them from purchasing a handgun from a federal firearm licensee (“FFL”). Naquin Decl. ¶¶ 1, 3, App. 1.
2. Plaintiff Naquin is acquainted with the proper and safe handling, use, and storage of handguns and handgun ammunition. Plaintiff Naquin does not own a handgun, but she desires to purchase one for lawful purposes including self-defense. Naquin Decl. ¶¶ 4-5, App. 1.
3. Plaintiff Naquin would purchase a handgun and ammunition from a lawful dealer in her area if not for the laws and regulations at issue in this case. Naquin Decl. ¶ 5, App. 1.

4. Plaintiffs Firearm Policy Coalition, Second Amendment Foundation, and Louisiana Shooting Association (the “Organizational Plaintiffs”) are nonprofit organizations dedicated to promoting the right to keep and bear arms. Their members include male and female adults between the ages of eighteen and twenty-one who would purchase handguns from FFLs if not for the laws and regulations at issue in this case. Combs Decl. ¶¶ 3-6, App. 3-4; Gottlieb Decl. ¶¶ 3-6, App. 5-6; Hunt Decl. ¶¶ 3-6, App. 7-8.
5. The Organizational Plaintiffs also count as members many FFLs who would sell handguns and handgun ammunition to adults between eighteen and twenty-one if not for the laws and regulations at issue in this case. Combs Decl. ¶ 7, App. 4; Gottlieb Decl. ¶ 7, App. 6; Hunt Decl. ¶ 7, App. 8.
6. Plaintiff Naquin is a member of all Organizational Plaintiffs. Naquin Decl. ¶ 2; Combs Decl. ¶ 8, App. 4; Gottlieb Decl. ¶ 8, App. 6; Hunt Decl. ¶ 8, App. 8.

Dated: June 17, 2021.

Respectfully submitted,

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