

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

CALEB REESE <i>et al.</i>,)	
)	Civil Action No. 6:20-cv-01438
Plaintiffs,)	
)	
v.)	
)	
BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES <i>et al.</i>,)	
)	
Defendants.)	
)	

**DEFENDANTS’ MOTION TO DISMISS PLAINTIFFS’
AMENDED COMPLAINT OR FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(6), and 56, Defendants Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”); Regina Lombardo, Acting Director of the Bureau of Alcohol, Tobacco, Firearms and Explosives; and Merrick B. Garland, Attorney General of the United States, respectfully move this Court to dismiss Plaintiffs’ amended complaint for lack of subject matter jurisdiction and for failure to state a claim on which relief can be granted, or to enter summary judgment for Defendants. In accordance with the Court’s Local Rules, this motion is accompanied by a memorandum consisting of a concise statement of reasons in support of the motion and citations of the authorities on which Defendants rely, and a statement of undisputed material facts.

Dated: May 27, 2021

Respectfully submitted,

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/s/ Daniel Riess
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