

**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 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, in her official capacity; and Merrick B. Garland,¹ Attorney General of the United States, in his official capacity, respectfully move this Court to dismiss Plaintiff’s 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: April 15, 2021

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

¹ Pursuant to Federal Rule of Civil Procedure 25(d)(1), Merrick B. Garland is automatically substituted for his predecessor, William P. Barr, Attorney General of the United States.

/s/ Daniel Riess
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