

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHUI W. KWONG; GEORGE GRECO; GLENN  
HERMAN; NICK LIDAKIS; TIMOTHY S.  
FUREY; DANIELA GRECO; NUNZIO CALCE;  
SECOND AMENDMENT FOUNDATION, INC.;  
and THE NEW YORK STATE RIFLE & PISTOL  
ASSOCIATION, INC.,

Plaintiffs,

-against-

MICHAEL BLOOMBERG, in his Official  
Capacity as Mayor of the City of New York; and  
CITY OF NEW YORK,

Defendants.

-and-

ATTORNEY GENERAL OF THE STATE OF  
NEW YORK,

Intervenor.

No. 11 Civ. 2356 (JGK) (DCF)

ECF Case

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil Procedure and the Scheduling Order in this case, Plaintiffs move for summary judgment that:

1. New York City's \$340 fee for a "Residence Premises" handgun license, N.Y.C. Admin. Code § 10-131(a)(2), is constitutionally impermissible; and
2. Section 400(14) of the New York Penal Law denies equal protection of the law, as-applied to authorize a "Residence Premises" handgun license fee in excess of \$10.

PLEASE TAKE FURTHER NOTICE that Plaintiffs rely upon the Memorandum of Law, Statement of Undisputed Facts, and supporting Declarations and Exhibits filed herewith.

Dated: New York, New York  
June 22, 2011

**DAVID JENSEN PLLC**

By: 

David D. Jensen, Esq.  
708 Third Avenue, Sixth Floor  
New York, New York 10017  
Tel: 212.380.6615  
Fax: 917.591.1318  
david@djensenpllc.com  
*Attorney for Plaintiffs*