

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

KEVIN W. CULP, MARLOW DAVIS,)
FREDDIE REED-DAVIS,)
DOUGLAS W. ZYLSTRA,)
JOHN S. KOLLER, STEVE STEVENSON,)
PAUL HESLIN, MARLIN MANGELS,)
GUS C. BROWNE II,)
JEANELLE WESTROM,)
SECOND AMENDMENT FOUNDATION,)
INC., ILLINOIS CARRY and)
ILLINOIS STATE RIFLE ASSOCIATION,)

Plaintiffs,)

v.)

Case No. 3:14-CV-3320-SEM-TSH

LISA MADIGAN, in her Official Capacity)
as Attorney General of the State of Illinois;)
HIRAM GRAU, in his Official Capacity as)
Director of the Illinois State Police, and)
JESSICA TRAME, as Bureau Chief of the)
Illinois State Police Firearms Services)
Bureau,)

Defendants.)

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

COME NOW the Plaintiffs, KEVIN W. CULP, MARLOW DAVIS, FREDDIE REED-DAVIS, DOUGLAS W. ZYLSTRA, JOHN S. KOLLER, STEVE STEVENSON, PAUL HESLIN, MARLIN MANGELS, JEANELLE WESTROM, SECOND AMENDMENT FOUNDATION, INC., ILLINOIS CARRY and ILLINOIS STATE RIFLE ASSOCIATION, by and through undersigned counsel, and move for the entry of an order:

1. Preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive

actual notice of the injunction, from enforcing from enforcing the non-residency application ban of 430 ILCS 66/40 against the Plaintiffs and/or their members;

2. Preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing any other sections of the Illinois Compiled Statutes which restricts non-residents of Illinois, including Plaintiffs and their members, firearms rights and privileges based solely on their state of residence.

3. A Memorandum in Support of this Motion will be filed at or near the time of the filing of this Motion.

Dated: August 5, 2015

Respectfully submitted,

By: /s/ David G. Sigale
David G. Sigale

Attorney for Plaintiffs

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