



*State of New Jersey*

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May 10, 2021

The Honorable Renee Marie Bumb, U.S.D.J.  
United States District Court  
For the District of New Jersey  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: Stanley Bennett, et al. v. Chief Andrew Davis, et al.  
Civil Action No. 20-15406 (RMB-SAK)

Dear Judge Bumb:

I represent Defendants Gurbir Grewal, and Patrick J. Callahan in the above captioned matter. I am writing this letter on behalf of all of the parties in this matter to jointly request a stay of this case pending a decision in the case now before the Supreme Court of the United States: *New York State Rifle & Pistol Assn., Inc., et al. v. Keith M. Corlett, et al.* (See attached Order granting Certiorari). That case presents a challenge under the Second Amendment to the State of New York's statutory regime governing individuals' ability to carry a handgun outside the home. Similar to New Jersey's system where applicants are required to show a "justifiable need" to carry a handgun, New York's statutes require that applicants show a "proper cause" prior to obtaining a license to carry. There is a substantial likelihood that the Court's ruling in that case would govern or at least inform the ultimate result in this case and, as a result, the parties in this matter all jointly request that this case be stayed pending the disposition of the New York State Rifle and Pistol Association case. Additionally, Plaintiffs request, and Defendants consent to, a period of 30 days after the stay is lifted in order to file an



Amended Complaint in light of the Supreme Court's ruling in that case. Thank you for your consideration of this request.

Sincerely,

S/Matthew J. Lynch  
Matthew J. Lynch  
Deputy Attorney General

Cc: Via ECF  
David Douglas Jensen  
Shawn C. Huber  
William F. Cook  
Daniel E. Horgan