

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MAYOR AND CITY COUNCIL OF
BALTIMORE,
100 N. Holliday Street
Baltimore, Maryland 21202,

Plaintiff,

v.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES,
99 New York Avenue, NE
Washington, DC 20226,

Defendant.

Case No. 23-cv-03762-RDM

**DEFENDANT’S RESPONSE TO NATIONAL SHOOTING SPORTS FOUNDATION’S
MOTION TO INTERVENE**

On January 23, 2024, the National Shooting Sports Foundation (“NSSF”), a trade association for the firearms industry, moved to intervene in this case pursuant to Federal Rule of Civil Procedure 24(a) and (b). *See* ECF No. 11. On January 24, 2024, the Court ordered Plaintiff Mayor and City Council of Baltimore (“Plaintiff”) and Defendant Bureau of Alcohol, Tobacco, Firearms and Explosives (“Defendant”) to respond to NSSF’s motion on or before February 7, 2024. *See* January 24, 2024, Minute Order.

On February 5, 2024, Plaintiff filed a Consent Motion for Extension of Time to File Response/Reply to NSSF’s motion until February 14, 2024. *See* ECF No. 15. As of February 7, 2024, at 5:30 p.m., the Court has not ruled on Plaintiff’s Consent Motion.

Pursuant to the Court’s January 24, 2024, Minute Order, Defendant hereby notifies the Court that it takes no position as to whether the Court should grant intervention by NSSF either as of right or by permission.

Dated: February 7, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director

/s/ Pardis Gheibi

PARDIS GHEIBI (D.C. Bar No. 90004767)
Trial Attorney, U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Tel.: (202) 305-3246
Email: pardis.gheibi@usdoj.gov

Counsel for Defendant