

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND**

**MARYLAND SHALL ISSUE, INC., *et al.*,
9613 Harford Rd., Ste C #1015
Baltimore, Maryland 21234-2150,**

Plaintiffs,

No.: 1:22-cv-00865-SAG

v.

**ANNE ARUNDEL COUNTY,
MARYLAND
44 Calvert Street
Annapolis, MD 21401,**

Defendant.

PROPOSED ORDER

On April 20, 2022, the plaintiffs filed their motion for a preliminary injunction and a temporary restraining order seeking an order enjoining the defendant, Anne Arundel County, Maryland from enforcing Bill 108-21. Alternatively, plaintiffs filed a motion for summary judgment. These motions were supported by the declarations of each of the plaintiffs. Defendant filed a timely opposition and plaintiffs filed a timely reply in support of their motion,

WHEREFORE, THIS COURT:

A. FINDS that plaintiffs have shown: (1) a likelihood of success on the merits; (2) a likelihood of suffering irreparable harm in the absence of preliminary relief; (3) that the balance of equities tips in the party's favor; and (4) why the injunction is in the public interest, and that preliminary relief is necessary in order to maintain the status quo. *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008);

B. ORDERS that plaintiffs' motion for a preliminary injunction is granted and defendant is hereby preliminarily enjoined from enforcing Bill 108-21 pending further order of this Court;

C. FINDS, in the alternative, that there are no disputed issues of fact and that plaintiffs are entitled to summary judgment as a matter of law;

D. ORDERS that plaintiffs' alternative motion for summary judgment is granted and DECLARES that Bill 108-21 is a violation of the First Amendment rights of the plaintiff dealers, of the customers of the plaintiff dealers, and all members of plaintiff Maryland Shall Issue, Inc., who have done or may do business with the firearms dealers or sellers of ammunition located in Anne Arundel County since the April 10, 2022, effective date of Bill 108-21; and

E. FURTHER ORDERS that defendant Anne Arundel County is permanently enjoined from enforcing Bill 108-21.

The Honorable Stephanie A. Gallagher
Judge, United States District Court for
The District of Maryland