

EXHIBIT E

and armed intrusion" as a result of registering a firearm.

Admit.

3. No Plaintiff is "blind," as the term is defined in paragraph 28 of the Third Amended Complaint.

Admit.

4. The protection of police officers and the prevention of crime are each important and legitimate governmental interests.

Admit.

5. After remand here, the District amended its firearms law to, *inter alia*:

a. Clarify that the requirement to demonstrate knowledge of the District's firearms laws is a one-time requirement, per applicant (amending D.C. Code § 7-2502.03(a)(10));

Deny that requirement was "clarif[ied]," but admit that D.C. Code § 7-2502.03(a)(10) was so amended.

b. Repeal the requirement for a vision test (*id.*, § 7-2502.03(a)(11));

Deny, because the vision requirement was changed to a different standard.

c. Enlarge the list of methods by which applicants may demonstrate sufficient firearms training, including "a firearms training and safety class provided free of charge by the Chief [of the Metropolitan Police Department ("MPD")]" firearms training received in the U.S. military; or a license from another state for which at-least-equal firearms training is required (*id.*, §7-2502.03(a)(13));

Admit.

d. Repeal the requirement that each pistol be submitted for ballistic identification as part of the registration process (*id.*, § 7-2502.03(d));

Admit.

e. Eliminate the requirement that registrants produce photographs and instead requires the MPD to take a digitalized photograph and fingerprints at the time of registration (*id.*, § 7-2502.04(a) & (b));

Admit.

f. Clarify that renewal of registration may be completed online, by mail, or in-person (*id.*, § 7-2502.07a(c));

Deny that renewal of registration provision was "clarif[ied]," but admit that D.C. Code § 7-2502.07a(c) was so amended.

g. Eliminate the requirement that registrants undergo a criminal

background check every 6 years (*id.*, § 7-2502.07a(d)).

Admit.

Respectfully submitted,

Dick Anthony Heller
Absalom F. Jordan, Jr.
William Carter
Mark Snyder
William Scott
Asar Mustafa

By counsel

/S/ Richard E. Gardiner
Richard E. Gardiner
D.C. Bar No. 386915

/S/Stephen P. Halbrook
Stephen P. Halbrook
D.C. Bar No. 379799

Suite 403
3925 Chain Bridge Road
Fairfax, VA 22030
(703) 352-7276
(703) 359-0938 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PLAINTIFFS' RESPONSES TO DEFENDANTS' FIRST REQUESTS FOR ADMISSIONS were sent, via email, to Andrew J. Saindon and Chad A. Naso, Assistants Attorney General, this 24th day of October, 2012.

/s/Richard E. Gardiner

Richard E. Gardiner