

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No. 11-22026-Civ-Cooke/Turnoff

DR. BERND WOLLSCHLAEGER, et al.,

Plaintiffs,

v.

RICK SCOTT, in his official capacity as  
Governor of the State of Florida, et al.,

Defendants,

and

NATIONAL RIFLE ASSOCIATION,

Proposed Intervenor.

**PROPOSED INTERVENOR NATIONAL RIFLE ASSOCIATION'S MOTION TO  
EXPEDITE AND INCORPORATED MEMORANDUM OF LAW**

Pursuant to S.D. Fla. L.R. 7.1(e), Proposed Intervenor National Rifle Association (NRA) respectfully requests an order expediting consideration of its motion to intervene, also filed today. In particular, the NRA seeks an order setting July 5, 2011 as the deadline for plaintiffs to file their opposing memorandum and July 8, 2011 as the deadline for the NRA's reply. A proposed order is attached as Exhibit A.

**ARGUMENT**

Plaintiffs in this matter have filed a motion for a preliminary injunction, and it is the NRA's understanding that plaintiffs will seek expedited consideration of that motion. The NRA therefore respectfully requests an order expediting consideration of its motion to intervene such

that, if the motion is granted, the NRA may participate fully in briefing and arguing in opposition to plaintiffs' preliminary injunction motion.

As explained in our intervention motion, the NRA seeks to participate in this case to protect the substantial interests its members have in the Firearm Owners' Privacy Law. Plaintiffs' motion for a preliminary injunction threatens those interests, and the NRA thus seeks to participate in this critical stage of the proceedings. The NRA is prepared to meet any briefing schedule the Court sets on the plaintiffs' motion.

### **CONCLUSION**

For these reasons, the NRA respectfully requests an order expediting consideration of its motion to intervene and establishing July 5, 2011 as the deadline for plaintiffs to file an opposing memorandum and July 8, 2011 as the deadline for the NRA's reply.

**CERTIFICATE OF GOOD FAITH CONFERENCE; CONFERRED BUT UNABLE TO  
RESOLVE ISSUES PRESENTED IN THE MOTION**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues but has been unable to resolve the issues completely. In particular, counsel for defendants stated that defendants will not oppose this motion. Counsel for plaintiffs stated that plaintiffs will oppose this motion.

Dated: June 27, 2011

Respectfully submitted,

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*\*Pro hac vice application pending*

*Counsel for Proposed Intervenor NRA*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 27, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Gregory M. Cesarano  
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