

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTOPHER DAVIS; and COMMON-)	
WEALTH SECOND AMENDMENT, INC.,)	
)	
Plaintiffs,)	
)	
-against-)	
)	
RICHARD C. GRIMES, in his Official Capacity as)	
Chief of the Weymouth Police Department,)	CIVIL ACTION NO.
)	
Defendant,)	1:13-cv-10246
)	
-and-)	
)	
COMMONWEALTH OF MASSACHUSETTS,)	
)	
Intervenor.)	

PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION TO DISMISS

Plaintiffs do not oppose Defendant's motion to dismiss as moot, but consider it necessary to respond to certain statements made in Defendant's moving papers.

The parties were not able to reach agreement on the acceptable parameters of a policy for imposing restrictions on LTC's. Plaintiffs continue to have some concerns about Defendant's new policy, but consider this new policy a substantial improvement over the prior practice. Moreover, Defendant has now issued unrestricted LTC's to all individual Plaintiffs in this action and in the related action Batty v. Albertelli, no. 1:15-cv-10238, and (to Plaintiffs' knowledge) is now issuing unrestricted LTC's to qualified applicants who request them, which alleviates some of Plaintiffs' remaining concerns.

Respectfully submitted,

THE PLAINTIFFS,
By their attorneys,

/s/ David D. Jensen
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Dated: June 17, 2015

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 17 June 2015.

/s/ David D. Jensen
David D. Jensen