

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHRISTOPHER DAVIS; WILLIAM J.
THOMPSON, JR.; RANDY COLE, JR.; WILSON
LOBAO; ROBERT CAPONE; RYAN
SHAUGHNESSY; and COMMONWEALTH
SECOND AMENDMENT, INC.,

CIVIL ACTION NO.
1:13-cv-10246

Plaintiffs,

-against-

RICHARD C. GRIMES, in his Official Capacity as
Chief of the Weymouth Police Department; NEIL
F. OULLETTE, in his Official Capacity as Chief of
the Danvers Police Department; ROBERT L.
CHAMPAGNE, in his Official Capacity as Chief of
the Peabody Police Department; and GARY J.
GEMME, in his Official Capacity as Chief of the
Worcester Police Department,

Defendants.

**JOINT STATEMENT
PURSUANT TO L.R. 16.1**

The parties make this Joint Statement pursuant to Local Rule 16.1(d).

I. DISCOVERY PLAN

1. Topics on which Discovery may be Needed

- Defendants’ practices related to “sporting”-type restrictions on licenses to carry firearms (or “LTC’s”) issued pursuant to M.G.L. c. 140, § 131; and
- The number of active LTC’s issued by each Defendant that do and do not carry restrictions.

2. Proposed Discovery Plan

The parties will attempt to resolve the above factual issues by means of the requisite Rule 26(a) disclosures and written interrogatories. The parties will exchange Rule 26(a) disclosures in advance of the pretrial conference (April 17, 2013). The parties will exchange written interrogatories no later than April 19,

2013. The parties will exchange discovery requests and responses by e-mail. In the event that issues of fact remain, the parties will request a revision of this schedule. The parties do not plan to use expert witnesses.

3. Contemplated Motions

The parties anticipate moving for dispositive relief no later than June 30, 2013.

4. Issues with Electronically Stored Information

There do not appear to be any issues with the production of electronically stored information.

5. Issues with Claims of Privilege or Work Product Protection

Based on the parties' current understanding, there are no issues with claims of privilege or work product protection.

6. Whether Trial by Magistrate Judge would be Appropriate

After considering the matter, the parties do not feel that trial before a magistrate judge would be appropriate.

Respectfully submitted,

THE PLAINTIFFS,
By their attorneys,

/s/ David D. Jensen

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Dated: April 10, 2013

RICHARD C. GRIMES, in his Official Capacity as
Chief of the Weymouth Police Department, Defendant,
By His Attorneys,

/s/ Adam Simms
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Dated: April 10, 2013

ROBERT L. CHAMPAGNE, in his Official Capacity
as Chief of the Peabody Police Department, Defendant,
By His Attorneys,

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Dated: April 10, 2013

NEIL F. OUELLETTE, in his Official Capacity as
Chief of the Danvers Police Department, Defendant,
By His Attorney,

/s/ Geoffrey P. Wermuth
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Dated: April 10, 2013

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 10 April 2013.

/s/ David D. Jensen
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