

Exhibit 2

to

Plaintiffs' Cross-Motion for Summary Judgment

and

Opposition to Defendants' Motion for Summary
Judgment

DECLARATION OF STEPHEN V. KOLBE

I, Stephen V. Kolbe, under penalty of perjury, declare and state as follows:

1. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.
2. I live in Towson, Maryland.
3. I currently own one full-size semiautomatic handgun. This firearm is designed for, and comes standard with, detachable magazines which hold in excess of 10 rounds.
4. I do not own a regulated long gun.
5. Before the ban came into place, I was unable to purchase one of the banned firearms because I did not have sufficient funds at the time. However, I plan on purchasing one or more regulated long guns with standard detachable magazines holding in excess of ten rounds if allowed to do so by law.
6. After October 1, 2013, I am advised that I will no longer be allowed either to purchase or receive regulated long guns described as "assault weapons" in SB 281, or to purchase standard capacity magazines holding in excess of ten rounds for the firearm or firearms I may now own or may wish to purchase in the future, pursuant to SB 281.
7. The primary purpose for owning the firearm discussed herein is for self-defense in my home.
8. The regulated long guns possess features which make them ideal for self-defense in the home. These features are attractive to me.
9. I am a responsible, law-abiding citizen and lifetime citizen of the state of Maryland. I have a family, and am the owner and proprietor of a small business in Baltimore County. In the past, one of my employees received a threatening text from her boyfriend, where

he threatened to come to my business and kill my employee. I of course immediately called 911. It took more than thirty minutes for the Baltimore County Police Department to arrive. In the meantime, I stood in the door of my business, unarmed, in an attempt to stop any potential attack on my employees which, fortunately, did not materialize.

10. I live exposed on a high-traffic public highway and frequently have strangers come to my door, and have had my car vandalized several times.

11. It is an unfortunate reality that there will be times when the police or the government simply will not be able to help you. The aftermath of Hurricane Katrina makes it very clear that there may be a time when the government simply cannot help me.

12. Additionally, the fact of the matter is that it is unlikely that the police could prevent harm to my family if my home ever were invaded. I was horrified to hear the story of the recent home invasion in Perryville, Maryland. In that case, three armed assailants broke into a family's home at 3:45 AM and held them at gun point while they robbed them. The father was eventually able to break away, retrieve his handgun, and chase the assailants away. As a husband and father of two young children, I shudder to think what might have happened if the father had not been able to arm himself. I am also aware of a recent related series of armed break-ins in Pikesville, where individuals and a family were held at gunpoint, defenseless. No police helped these people, or stopped these invasions from happening.

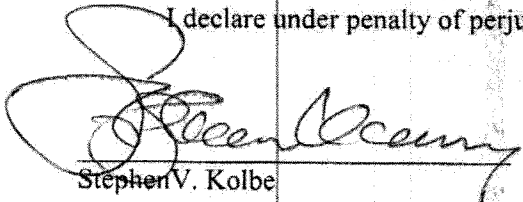
13. I believe it is my right to defend myself, my wife and my children, if necessary, in my home, with the firearm of my choice. During my deposition, I was asked by one of the lawyers for the Defendants if that included an anti-aircraft gun. That was a frivolous question, but this is not a frivolous issue. I am ultimately responsible for the safety and security of myself and my family, and I do not believe that it is appropriate under the United States Constitution for

the state of Maryland to impose unnecessary restrictions on my right of self defense, especially when the same restrictions will have no effect on crime. I am not a gun collector, nor do I engage in tactical-style shooting. All I want is to be able to protect my family effectively and to have access to the most effective firearms for doing that, if, God forbid, the situation should arise. Being rationed to 10 rounds when my family's lives are on the line is simply not acceptable.

14. I think it is inherently unfair that a neighbor, retiring from law enforcement, can receive a firearm banned for my use, or obtain standard capacity magazines, while I cannot, for self defense in the home.

15. I do not possess any qualities or characteristics that would preclude me from owning any of the firearms discussed herein under federal or state law.

I declare under penalty of perjury that the foregoing is true and correct.


Stephen V. Kolbe

MARCH 14, 2014
Date