

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF NEW JERSEY, et al.,

Plaintiffs,

v.

No. 1:25-cv-1807-PX

TODD BLANCHE, et al.,

Defendants.

NOTICE OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) and for the reasons set forth below, Plaintiffs hereby submit this notice of voluntary dismissal without prejudice of their claims against Defendants United States Department of Justice; Todd Blanche, in his official capacity as Acting Attorney General of the United States¹; the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”); Daniel Driscoll, in his official capacity as Acting Director of the Bureau of Alcohol, Tobacco, Firearms and Explosives (“Defendants”).

1. Plaintiffs filed their Complaint on June 9, 2025 (ECF No. 2), a Motion for Preliminary Injunction on June 10, 2025 (ECF No. 5), and an Amended Complaint on July 7, 2025 (ECF No. 86).

2. Plaintiffs’ Motion for Preliminary Injunction argued that Defendants’ decision to distribute certain forced-reset triggers (FRTs) that Defendants had previously recovered is ultra

¹ The caption has been revised to reflect the present Acting Attorney General of the U.S. Department of Justice. *See* Fed. R. Civ. P. 25(d) (“The officer’s successor is automatically substituted as a party.”).

vires and contrary to law, and asserted injuries arising from the distribution of FRTs into Plaintiff States. *See* ECF 5.

3. In response to Plaintiffs’ Motion for Preliminary Injunction, Defendants provided a sworn statement to the Court committing not to return FRTs into Plaintiff States California, Colorado, Delaware, District of Columbia, Hawai‘i, Illinois, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, Oregon, Rhode Island, and Washington (collectively, the “Covered States”). ECF 64-1, ¶12.

4. Defendants further committed to taking certain steps to ensure that FRTs would not be returned into the Covered States. Specifically, Defendants committed that owners in the Covered States would be given three options for disposition of their FRTs: 1) requesting that ATF transfer the device to them in a state where it is legal to possess; 2) requesting that ATF transfer the device to a third party in a state where it is legal to possess; or 3) withdrawing the request for the return and abandon the device to ATF, in which case ATF would destroy the abandoned property without compensation and in accordance with federal law. *Id.* Defendants further committed to warning owners in the Covered States that they may not bring any returned FRT into a jurisdiction prohibiting FRTs or trigger activating devices and that doing so could subject them to state prosecution. *Id.*

5. Defendants have since provided information to Plaintiffs confirming that ATF is nearing completion of the returns and has adhered to the commitments it made in response to Plaintiffs’ Motion for Preliminary Injunction: they have not returned FRTs into the Covered States; owners in the Covered States have been given the three alternative options for the disposal of their FRTs; and ATF has warned FRT-returnees about the legal risk of bringing FRTs into the Covered States.

6. Based on the foregoing, Plaintiffs have agreed to dismiss this action without prejudice. Plaintiffs expressly reserve the right to file a new action challenging any attempt by Defendants to return or distribute FRTs into Plaintiff States.

Dated: April 23, 2026

Respectfully submitted,

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** Pro hac vice application pending or forthcoming*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of April, 2026, a true and correct copy of the foregoing was filed electronically upon counsel for all parties.

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