

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

NATIONAL ASSOCIATION FOR GUN RIGHTS, )  
and TONI THERESA SPERA FLANIGAN )  
Plaintiffs, )

v. )

Civil Action No.  
3:22 CV 1118 (JBA)

NED LAMONT, is his official capacity as the )  
Governor of the State of Connecticut; )  
PATRICK J. GRIFFIN, is his official capacity as the )  
Chief State’s Attorney of the State of Connecticut; )  
and SHARMESE L. WALCOTT, in her official )  
capacity as the State’s Attorney, Hartford Judicial )  
District, )  
Defendants. )

November 3, 2022

**PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed.R.Civ.P. 65, the Plaintiffs, NATIONAL ASSOCIATION FOR GUN RIGHTS, and TONI THERESA SPERA FLANIGAN, now move for the entry of a preliminary injunction against the Defendants, NED LAMONT, is his official capacity as the Governor of the State of Connecticut, PATRICK J. GRIFFIN, is his official capacity as the Chief State’s Attorney of the State of Connecticut, and SHARMESE L. WALCOTT, in her official capacity as the State’s Attorney, Hartford Judicial District, (collectively, the “State”) prohibiting the enforcement of CONN. GEN. Stat. § 53-202c(a) and CONN. GEN. STAT. § 53-202w(b) and (c) (collectively, the “Statutes”) because these statutes are unconstitutional.

The Statutes purport to ban (1) certain semi-automatic firearms that are held by millions of law-abiding American citizens for lawful purposes and (2) certain firearm magazines that are held by millions of law-abiding American citizens for lawful

**ORAL ARGUMENT REQUESTED**

purposes. The Second Amendment protects the right of law-abiding citizens to own weapons in common use by law-abiding citizens for lawful purposes. *D.C. v. Heller*, 554 U.S. 570, 627 (2008). Thus, these provisions of the Statutes are unconstitutional. Accordingly, Plaintiffs hereby move the Court to enter a preliminary injunction enjoining the State from enforcing these unconstitutional provisions of the Statutes.

Consistent with D.Conn.L.R. 7(a), the Plaintiffs have submitted a memorandum of law in support of their Motion for Preliminary Injunction.

WHEREFORE, the Plaintiffs pray that their Motion for Preliminary Injunction is granted.

THE PLAINTIFFS  
NATIONAL ASSOCIATION FOR  
GUN RIGHTS, and TONI  
THERESA SPERA FLANIGAN

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**CERTIFICATION**

I hereby certify that on November 4, 2022, a copy of foregoing was filed electronically. Notice of this filing will be sent by e-mail to all appearing parties by operation of the Court's electronic filing. Parties may access this filing through the Court's system.

/s/ Barry K. Arrington  
Barry K. Arrington