

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES, *et al.*,

Defendants.

Case No. 2:24-cv-00089-Z

Judge Matthew J. Kacsmayk

**MOTION FOR LEAVE TO INTERVENE**

Proposed Intervenor-Defendants the State of New Jersey, Arizona, Colorado, Connecticut, Delaware, Hawai'i, Maryland, Attorney General Dana Nessel on behalf of the People of Michigan, Minnesota, Nevada, North Carolina, Oregon, Rhode Island, Vermont, and Washington (collectively, "Movant States") respectfully request that the Court grant them leave to intervene as defendants in this action as of right pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, grant permissive intervention pursuant to Federal Rule of Civil Procedure 24(b)(1)(B).

In support of this Motion, Movant States rely on and incorporate herein their Memorandum of Law and the accompanying appendix. Movant States have also attached Proposed Answer, *see* Appx. at 43, as required by Federal Rule of Civil Procedure 24(c).

Dated: January 16, 2025

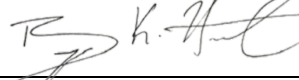
Respectfully submitted,

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**JEREMY M. FEIGENBAUM\***

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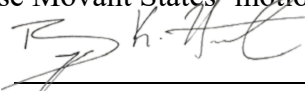
*Attorneys for State of Washington*

*\*Pro Hac Vice Motions Forthcoming*

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a), (b), I hereby certify that on January 15, 2025, I conferred via email with Stephen Stamboulieh, counsel for Plaintiffs, concerning Movant States' motion to intervene. Plaintiffs' counsel Stephen Stamboulieh stated that Plaintiffs opposed Movant States' motion to intervene. On January 15, 2025, I also conferred via email with Jeremy S.B. Newman, counsel for Defendants, concerning Movant States' motion to intervene. Defendants' counsel Jeremy S.B. Newman stated that Defendants oppose Movant States' motion to intervene.

Dated: January 16, 2025



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Bryce K. Hurst  
*Attorney for State of New Jersey*

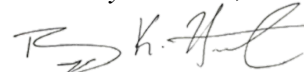
### **CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 16, 2025, I caused the attached documents to be served via electronic filing on all counsel of record.

Dated: January 16, 2025

Respectfully submitted,

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