

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF LYNCHBURG

**MELODY BOYER,
NATASHA ROUSSEAU,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION,**

Plaintiffs,

v.

Case No. _____

**COLONEL JEFFREY S. KATZ,
In His Official Capacity as
Superintendent of the Virginia State Police
7700 Midlothian Turnpike
North Chesterfield, VA 23235,**

Defendant.

**PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

COME NOW Plaintiffs, by counsel, pursuant to Rules 3:26 and 4:15 of the Rules of the Supreme Court of Virginia, and, for the reasons stated in the Complaint and Plaintiffs' forthcoming Memorandum in Support, move this Court for a temporary restraining order and preliminary injunction against enforcement and administration of:

(i) Va. Code § 18.2-308.7(C) (prohibiting "any person younger than 21 years of age" from "knowingly and intentionally purchas[ing] a handgun or assault firearm anywhere in the Commonwealth"); and

(ii) Va. Code § 18.2-308.2:5 (criminalizing the private sale of firearms unless the prospective purchaser completes a government-administered background check) (collectively, the “Challenged Statutes”);

Plaintiffs further request that no bond be required given that the injunction sought seeks only equitable relief in the form of enjoining enforcement of unconstitutional statutes, and Defendant will not suffer any monetary harm.

Respectfully submitted,

**MELODY BOYER,
NATASHA ROUSSEAU,
GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
VIRGINIA CITIZENS DEFENSE LEAGUE, and
VIRGINIA CITIZENS DEFENSE FOUNDATION**

BY:



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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

In accordance with Va. Code § 8.01-629, the undersigned certifies that, on October 6, 2026,
a true and accurate copy of the foregoing Motion for Temporary Restraining Order and Preliminary
Injunction was e-mailed to the following:

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