

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BONITA SHREVE, <i>et al.</i>	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Civil No.: 3:25-cv-214-SLH
	)	
UNITED STATES POSTAL SERVICE, <i>et al.</i>	)	
	)	
<i>Defendants.</i>	)	
	)	

---

**PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs Bonita Shreve, Gun Owners of America, Inc., and Gun Owners Foundation, by and through undersigned counsel, hereby move this Court for an order granting summary judgment against Defendants, and state as follows:

1. Plaintiffs seek an order declaring that 18 U.S.C. § 1715 and its implementing postal regulations contained within U.S. Postal Service Publication 52, including Publication 52 §§ 432.1 and 432.2, violate the Second Amendment to the U.S. Constitution.
  
2. Plaintiffs further seek an order permanently enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the order, from enforcing 18 U.S.C. § 1715 and its implementing postal regulations.
  
3. Plaintiffs include an individual and two Second Amendment advocacy organizations. The individual Plaintiff and these organizations’ members and supporters, many of whom reside within this district, wish to use the U.S. Postal Service to mail their lawfully owned handguns for lawful purposes, and to receive the same.
  
4. However, 18 U.S.C. § 1715 criminalizes Plaintiffs’ desired course of conduct.

5. Defendants enforce 18 U.S.C. § 1715 and its implementing postal regulations.
6. Plaintiffs assert that 18 U.S.C. § 1715 and its implementing postal regulations violate their rights to keep and bear arms protected by the Second Amendment to the U.S. Constitution.
7. Through counsel, Plaintiffs have discussed this Motion with Defendants. Defendants oppose the relief sought.
8. The grounds for this Motion are set forth more fully in the accompanying Memorandum in Support, Statement of Material Facts, Declarations, and Appendix, which are incorporated by reference herein.

Dated: December 18, 2025

/s/ Oliver M. Krawczyk  
Gilbert J. Ambler (PA 326124)  
Oliver M. Krawczyk (PA 334423)  
AMBLER LAW OFFICES, LLC  
115 South Hanover Street, Suite 100  
Carlisle, PA 17013  
T: (717) 525-5822  
F: (540) 773-2414  
gilbert@amblerlawoffices.com  
oliver@amblerlawoffices.com

Respectfully submitted,

/s/ Stephen D. Stamboulieh  
Stephen D. Stamboulieh (MS 102784)  
STAMBOULIEH LAW, PLLC  
P.O. Box 428  
Olive Branch, MS 38654  
T: (601) 852-3440  
stephen@sdslaw.us

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 18, 2025, Plaintiffs served the foregoing Motion for Summary Judgment, together with all papers in support thereof, on all parties in this matter via the Court's electronic filing system.

Dated: December 18, 2025

/s/ Oliver M. Krawczyk  
Oliver M. Krawczyk