

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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CHRISTOPHER M. FLETCHER, et al.,)	
)	
)	Civil Action No. 11-CV-10644-DPW
Plaintiffs,)	
v.)	
)	
ROBERT C. HAAS, et al.,)	
)	
Defendants.)	
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PARTIES’ JOINT STATEMENT

Pursuant to this Court’s Notice of Scheduling Conference and Fed. R. Civ. P. 16(b) and 26(f), the parties in the above captioned action hereby file this Joint Statement.

1. Agenda – Argument on Motions to Dismiss

The parties are prepared to present oral argument and answer the Court’s questions regarding the defendants’ motions to dismiss.

2. Joint Discovery Plan

The parties do not believe any discovery is necessary. The parties do not believe expert testimony is relevant to any issue in this case, as the case raises pure issues of law.

3. Proposed Schedule for Filing of Motions

Should any defendant’s motion to dismiss be denied, plaintiffs intend to move for summary judgment.

4. LR 16.1(D)(3) Certifications

Plaintiffs Christopher M. Fletcher, Eoin M. Pryal, Second Amendment Foundation, Inc., and Commonwealth Second Amendment, Inc. affirm that they have conferred with litigation counsel: (a) with a view to establish a budget for the costs of conducting the full course—and various alternative courses—of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

/s/ Christopher M. Fletcher

/s/ Eoin M. Pryal

/s/ Brent Carlton, as President of Commonwealth Second Amendment, Inc.

/s/ Alan Gottlieb, as Executive Vice President of Second Amendment Foundation, Inc.

/s/ Joseph M. Hickson III

Defendant Jason A. Guida affirms that he has conferred with litigation counsel: (a) with a view to establish a budget for the costs of conducting the full course—and various alternative courses—of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

/s/ Jason A. Guida

/s/ Kenneth W. Salinger, Assistant Attorney General

LR 16.1(D)(3) Certifications for defendant Robert C. Haas and defendant Mark K. Leahy shall be filed separately.

Respectfully submitted:

/s/ David J. Doneski

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CERTIFICATE OF SERVICE

I, Joseph M. Hickson III, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants on June 16, 2011.

Dated: June 16, 2011

/s/ Joseph M. Hickson III
Joseph M. Hickson III