

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF NEW JERSEY, et al.,

Plaintiffs,

v.

No. 1:25-cv-1807-PX

PAMELA J. BONDI, et al.,

Defendants.

NOTICE OF WITHDRAWAL OF MOTION FOR PRELIMINARY INJUNCTION

In light of the following representations made by the federal government Defendants and Rare Breed Triggers Defendants following the filing of this action challenging the redistribution of forced-reset triggers (FRTs), and given considerations of judicial economy, Plaintiffs hereby withdraw their motion for preliminary injunction without prejudice.

a. Pursuant to paragraph 12 of the Declaration of Matthew P. Varisco (ECF 64-1), and based on subsequent communications with counsel for the federal government Defendants, the federal government Defendants will not return FRTs into the following Plaintiff States: California, Colorado, Delaware, District of Columbia, Hawai'i, Illinois, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, Oregon, Rhode Island, and Washington. Further, owners in those States will be given three options for disposition of their FRTs, and will be warned that they may not bring any returned FRT into a jurisdiction prohibiting FRTs and that doing so could subject them to state prosecution.

b. Pursuant to paragraph 5 of the Declaration of Lawrence A. DeMonico (ECF 65-1), the RBT Defendants will not sell redistributed FRTs into any of the Plaintiff States, directly or indirectly.

c. Pursuant to representations made by counsel for the federal government Defendants for the first time at the hearing in this matter on July 9, 2025, the federal government anticipates, based on current information, returning no more than 12 FRTs to known federal firearms licensed commercial sellers other than RBT.

Dated: June 10, 2025

Respectfully submitted,

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* *Pro hac vice*

** *Pro hac vice application pending*

*** *Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I certify that on July 7, 2025, I filed a copy of the foregoing Notice of Withdrawal of Motion for Preliminary Injunction via CM/ECF and thereby served counsel for all parties who have appeared on the Court's electronic docket.

For Plaintiffs whose counsel's motions for admission pro hac vice are forthcoming, I served the foregoing document via email to those counsel.

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