UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

OCEAN STATE TACTICAL, LLC, et al.
Plaintiffs,

v.

STATE OF RHODE ISLAND,
Defendant.

C.A. No. 1:22-cv-00246-JJM-PAS

JOINT STATUS REPORT

Now come the parties and submit this Joint Status Report pursuant to the Court's July 10, 2025 Text Order. After conferring, the parties agree that no fact discovery is necessary but expert discovery should be permitted for the limited purpose of allowing the already-designated experts to update their declarations, submitted nearly three years ago, to reflect developments in the field. The parties further reserve the opportunity to depose the experts before filing cross-motions for summary judgment. With these considerations in mind, and accounting for the designated experts' scheduling demands, the parties propose the following schedule:

A. Parties shall make any updated expert disclosures by **January 15, 2026**, with the understanding that parties shall not introduce new experts but only update expert declarations submitted as part of the TRO/Preliminary Injunction motion practice;

B. All expert discovery shall be completed by **March 15, 2026**;

C. Plaintiffs' summary judgment motion shall be filed by **April 15, 2026**;

D. Defendant's summary judgment response/cross-motion for summary judgment shall be filed by **May 15, 2026**;

E. Plaintiffs' summary judgment reply/opposition to Defendant's cross-motion shall be filed by **June 1, 2026**;

F. Defendant's reply to Plaintiffs' opposition shall be filed by **June 16, 2026**.

Wherefore, the parties jointly request that this proposed scheduling order be issued.[1]

Dated: August 7, 2025

Respectfully submitted,

PLAINTIFFS

By their attorney,

/s/ Matthew D. Rowen
Matthew D. Rowen, *pro hac vice*

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Respectfully submitted,

DEFENDANT

By its attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the within document via the ECF filing system on August 7, 2025, and that a copy is available for viewing and downloading. I also caused a copy to be sent via the ECF system to the attorneys of record.

/s/ Paul T.J. Meosky

[1] The parties note that, as of the date of this status report, no mandate has yet issued from the First Circuit pursuant to Rule 41, but the parties anticipate a mandate will be forthcoming.