

LAW OFFICES

J. SCOTT WATSON, P.C.
24 Regency Plaza
Glen Mills, Pennsylvania 19342
(610) 358-9600
Fax: (610) 358-9601

J. Scott Watson, Esquire
Gregory J. Allard, Esquire
Ryan S. Watson, Esquire*
*Admitted to PA & NJ

November 16, 2016

Honorable Michael A. Shipp, U.S.D.J.
United States District Court For
The District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**RE: *New Jersey Second Amendment Society v. Porrino*; Civil Action
No. 16-4906**

Dear Judge Shipp:

I represent the Plaintiffs in the above-styled action. I write in response to Defendants' letter dated November 16, 2016, ECF No. 21, wherein they requested this Court to schedule "an in-person conference in the hopes of resolving this case in an amicable and non-adversarial (sic) manner." Additionally, Defendants requested that Plaintiffs' Motion for Judgment on the Pleadings be effectively stayed pending resolution of what we understand to be a settlement conference.

Defendants' citation to *Moore v. Madigan*, 702 F. 3d 933, 942 (7th Cir. 2012) is correct for the proposition that it stayed that court's mandate for 180 days pending

the Illinois legislature crafting new firearms laws. However, that stay did not occur until *after* the case was concluded and judgment rendered in favor of the Plaintiff.

There should not be a stay on the Motion for Judgment on the Pleadings in this case. The proper procedural method is for this Court issue judgment in favor of Plaintiffs. Then this Court could stay its Order pending the issuance of “reasonable regulations” that Defendants desire to implement. Even if the Court were to stay the pending motion, and the Superintendent of the New Jersey State Police issues new “reasonable regulations,” that does not eliminate New Jersey’s *ban* on electronic weapons. Moreover, the Attorney General has not stated that he has the authority to repeal the ban. It is our belief that it would take an act of the legislature to repeal it.

The Motion for Judgment on the Pleadings should be ruled upon. At that time, a settlement conference can be conducted if one is necessary. We do not object to an in-person settlement conference. Our objection is to the procedural method of staying the ruling on the pending motion without a ruling from this Court on the motion.

Yours very truly,

/s/ Ryan S. Watson

Ryan S. Watson

Attorney for Plaintiffs

cc: All counsel of record via ECF