

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY, TRENTON DIVISION**

NEW JERSEY SECOND)
AMENDMENT SOCIETY AND)
MARK CHEESEMAN)
)
Plaintiffs,) HON. MICHAEL A. SHIPP, U.S.D.J.
) Case No. 16-4906-MAS-DEA
v.)
)
CHRISTOPHER S. PORRINO, et al.)
)
Defendants.)
_____)

**NOTICE OF SERVICE OF REQUEST FOR PRODUCTION OF
DOCUMENTS, FIRST SET OF INTERROGATORIES TO DEFENDANTS,
AND FIRST SET OF REQUEST FOR ADMISSIONS**

TO: Daniel M. Vanella
Matthew Lynch
R.J. Hughes Justice Complex
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Trenton, NJ 08625
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COMES NOW, New Jersey Second Amendment Society and Mark Cheeseman (“Plaintiffs”), by and through their counsel of record, and Notice the following, sent by electronic mail to the above electronic mail addresses:

- 1) Request for Production of Documents;

- 2) First Set of Interrogatories to Defendants; and
- 3) First Set of Requests for Admissions.

The undersigned retains the originals as custodian of the documents.

This, the 22nd day of December, 2016.

Respectfully submitted,

/s/ Ryan S. Watson
RYAN S. WATSON

Of Counsel:

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CERTIFICATE OF SERVICE

I, Ryan S. Watson, counsel of record for Plaintiffs, hereby certify that the foregoing document or pleading has been filed with the Clerk of the United States District Court, District of New Jersey, via ECF and that all counsel of record has received electronic notice of this filing.

Dated: December 22, 2016

/s/ Ryan S. Watson
Ryan S. Watson

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NEW JERSEY SECOND)	
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Plaintiffs,)	HON. MICHAEL A. SHIPP, U.S.D.J.
)	Case No. 16-4906-MAS-DEA
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)	
CHRISTOPHER S. PORRINO, et al.)	
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Defendants.)	
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**PLAINTIFFS’ FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS, FIRST SET OF INTERROGATORIES TO DEFENDANTS,
AND FIRST SET OF REQUESTS FOR ADMISSIONS**

COMES NOW, New Jersey Second Amendment Society and Mark Cheeseman (“Plaintiffs”), by and through their counsel of record, and propounds this First Set of Requests for Production of Documents, First Set of Interrogatories to Defendants, and First Set of Requests for Admissions as follows:

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) Please provide a copy of any/all documents which any expert you have identified, retained, or otherwise consulted with, has relied upon in forming his or her expert opinion, or will rely upon in giving his or her expert

opinion or testimony, as well as a copy of every report which any such expert witness has provided to you.

- 2) Please provide a copy of all documents used in responding to the Interrogatories and Requests for Admissions.
- 3) Please provide a copy of all documents that have any relevance or are reasonably calculated to lead to the identification of any document relevant to the claims or defenses in this lawsuit.
- 4) Please provide a copy of all draft and/or final electronic control device statutes or regulations that New Jersey seeks to implement.

REQUESTS FOR ADMISSIONS

- 1) Please admit that New Jersey's stun gun/Taser ban is unconstitutional.
- 2) Please admit that New Jersey conceded that the stun gun/Taser ban was unconstitutional.
- 3) Please admit that New Jersey continues to enforce the stun gun/Taser ban.

- 4) Please admit that individuals have been prosecuted since November 7, 2016 under New Jersey's stun gun/Taser ban.

INTERROGATORIES

- 1) Please state how many criminal cases for stun guns and/or Tasers New Jersey prosecuted in the past two years.
- 2) Please articulate a legitimate reason for denying New Jersey residents their Second Amendment rights.
- 3) Please state how many permits to carry are active as of the date on this pleading in New Jersey.
- 4) Please state, out of those active permits, what the "justifiable need" basis was to issue that permit.
- 5) Please state, out of those numbers of active permits in Interrogatory Number 4, the race, gender, and age of each of those active permits.

- 6) Please state how many individuals applied for permits to carry for the past two years.
- 7) Please state, out of those numbers of applicants in Interrogatory Number 6, the race, gender, and age of each of those applicants.
- 8) Please state, out of those numbers of applicants in Interrogatory Number 6, the basis for the applicants “justifiable need.”
- 9) Please state the factual and legal basis for all of your defenses and affirmative defenses pled in your Answer, and identify all witnesses, facts, opinions and documents which you contend supports your position(s).
- 10) For each and every allegation in the Complaint which you denied in your Answer and/or you assert is false or inaccurate, please describe the factual and legal basis, and identify all supporting witnesses, facts, opinions and documents, which you contend proves or supports each denial, alleged falsity/inaccuracy.

- 11) For any request for admission denied in whole or in part, please state the factual and legal basis for your denial.

The undersigned retains the originals as custodian of the documents.

This, the 22nd day of December, 2016.

Respectfully submitted,

/s/ Ryan S. Watson
RYAN S. WATSON

Of Counsel:

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CERTIFICATE OF SERVICE

I, Ryan S. Watson, counsel of record for Plaintiffs, hereby certify that the foregoing document or pleading has been delivered by electronic mail to all counsel of record.

Dated: December 22, 2016

/s/ Ryan S. Watson
Ryan S. Watson