

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MICHELLE LANE, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:11cv503 (GBL/TRJ)
)	
ERIC HOLDER, Attorney General of the)	
United States, <i>et al.</i> ,)	
)	
Defendants.)	
)	

PROPOSED JOINT DISCOVERY PLAN

In accordance with Federal Rule of Civil Procedure 26(f) and this Court’s Order dated June 9, 2011, the parties jointly and by counsel, submit their joint discovery plan.

1. The parties have conferred pursuant to Rule 26(f).
2. In their First Amended Complaint, Plaintiffs allege that a federal statute, a federal regulation, a Virginia law, and a District of Columbia regulation violate their Second Amendment right to bear arms and their Fifth and Fourteenth Amendment rights to equal protection. *See* U.S. Const. Amend. II, V & XIV; 18 U.S.C. § 922(b)(3); 27 C.F.R. § 478.99; Va. Code § 18.2-308.2:2; D.C.M.R. 24-2320.3(b) & (f).
3. Accordingly, the First Amended Complaint presents pure questions of law that may be decided on motions to dismiss and/or for summary judgment.
4. Discovery is not foreseeable at this time. If, however, a party requires discovery at some future date, that party will seek leave of the Court to obtain that limited discovery on or before October 14, 2011, the close of discovery date set in the Court’s Scheduling Order.

5. The parties agree that settlement discussions would not be fruitful at this time and will notify the Court if they believe that a settlement conference may be beneficial at a later time.

6. The parties do not consent to the trial of this matter by a United States Magistrate Judge.

Respectfully submitted,

NEIL H. MacBRIDE
UNITED STATES ATTORNEY

June 29, 2011

By: _____ /s/
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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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