

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

CALEB REESE *et al.*,

Plaintiffs,

v.

THE BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES *et al.*,

Defendants.

:  
:  
:  
: **Civil Action No. 6:20-cv-01438**  
:  
: **Judge Summerhays**  
:  
: **Magistrate Judge Whitehurst**  
:  
:  
:  
:

**PLAINTIFFS' PROPOSED JUDGMENT**

Following a good faith attempt to reach agreement with the Government on proposed language for a final judgment in this case, the parties have reached an impasse. Plaintiffs therefore are submitting as an attachment to this document, pursuant to this Court's Order, Doc. 77 (July 30, 2025), a proposed final judgment for this Court's consideration. The Government's proposed judgment would deny relief to any members of the organizational plaintiffs, but the organizations' standing is predicated on their ability to get relief for their members and is well-established by Supreme Court precedent. *See Int'l Union, United Auto., Aerospace & Agric. Implement Workers of Am. v. Brock*, 477 U.S. 274, 290 (1986). Should the Court wish for briefing on this issue, Plaintiffs would be happy to provide a brief in support of their preferred judgment language.

Dated: September 2, 2025  
/s/ George J. Armbruster III  
George J. Armbruster III  
Armbruster & Associates, APLC  
332 E. Farrel Road, Suite D  
Lafayette, LA 70508  
Phone: 337-889-5511

Respectfully submitted,  
/s/ David H. Thompson  
David H. Thompson\*  
Peter A. Patterson\*  
William V. Bergstrom\*  
COOPER & KIRK, PLLC  
1523 New Hampshire Ave., N.W.

Fax: 337-889-5512  
Email: george@arm-assoc.com  
Local Counsel

Washington, DC 20036  
Telephone: (202) 220-9600  
Email: dthompson@cooperkirk.com  
*\*Admitted Pro Hac Vice*

Raymond M. DiGuiseppe - T.A.\*  
THE DIGUISEPPE LAW FIRM, P.C.  
4320 Southport-Supply Road, Suite 300  
Southport, NC 28461  
Phone: 910-713-8804  
Fax: 910-672-7705  
Email: law.rmd@gmail.com  
*\*Admitted Pro Hac Vice*

Joseph Greenlee\*  
FPC ACTION FOUNDATION  
5550 Painted Mirage Rd, Ste 320  
Las Vegas, NV 89149  
Phone: (916) 517-1665  
Email: jgreenlee@fpclaw.org  
*\*Admitted Pro Hac Vice*

John W. Dillon\*  
DILLON LAW GROUP APC  
2647 Gateway Road  
Carlsbad, CA 92009  
Phone: (760) 642-7150  
Fax: (760) 642-7151  
Email: jdillon@dillonlawgp.com  
*\*Admitted Pro Hac Vice*  
*Attorneys for Plaintiffs*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

**CALEB REESE *et al.*,**

Plaintiffs,

v.

**THE BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES *et al.*,**

Defendants.

:  
:  
:  
: **Civil Action No. 6:20-cv-01438**  
:  
: **Judge Summerhays**  
:  
: **Magistrate Judge Whitehurst**  
:  
:  
:  
:

---

**[PROPOSED] JUDGMENT**

In accordance with the Fifth Circuit’s decision in *Reese v. Bureau of Alcohol, Tobacco, Firearms, and Explosives*, 127 F.4th 583 (5th Cir. 2025):

1. Judgment is entered for Plaintiffs on Count I of the operative complaint.
2. The Court declares that 18 U.S.C. §§ 922(b)(1) & (c)(1), their derivative regulations, and all other laws, regulations, policies, practices, and customs implementing or effectuating the same, violate the right to keep and bear arms secured by the Second Amendment to the United States Constitution by prohibiting the sale or delivery of handguns and handgun ammunition to 18-to-20-year-olds.
3. Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them and who have notice of this Judgment are hereby enjoined from enforcing these provisions to prevent the sale or delivery of handguns and/or handgun ammunition by federally licensed firearm dealers to 18-to-20-year-old members of Plaintiffs Firearms Policy Coalition, Inc., Second Amendment Foundation, and/or Louisiana Shooting Association, on account of their age.

4. Count II of the operative complaint is moot and dismissed without prejudice.

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon. Robert R. Summerhays  
United States District Judge