

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

CALEB REESE <i>et al.</i> ,)	
)	Civil Action No. 6:20-cv-01438
Plaintiffs,)	
)	
v.)	
)	
BUREAU OF ALCOHOL, TOBACCO,)	
FIREARMS AND EXPLOSIVES <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

JOINT MOTION TO ALTER OR AMEND THE JUDGMENT

The Parties hereby jointly move to amend this Court’s Judgment, Doc. 82 (Oct. 7, 2025) in the following respects. To add the following underlined and bolded language to paragraph 2(b): “and (b) individuals and federally licensed firearms importers, manufacturers, dealers or collectors who were members of Firearms Policy Coalition, Inc., Second Amendment Foundation, or Louisiana Shooting Association at the time the action was filed on November 6, 2020 **and who are identified by Plaintiffs pursuant to paragraph 5.**” And to alter the language of paragraph 5 to replace “shall provide” with “may provide.” Given the urgency of the issues raised by the Court’s Judgment, the Parties respectfully request a ruling on this motion on or before October 14, 2025. In support of this motion the Parties state:

1. The Court’s Judgment compels Plaintiffs to disclose their membership as of November 6, 2020, to the Government by October 28, 2025.
2. The Government, as a general policy, does not compel disclosure of the identity of members of private organizations, and the Government did not seek to do so here.
3. Plaintiffs assert that the Judgment’s order compelling them to disclose their membership violates the First Amendment and would subject them to irreparable harm.

See, e.g. Americans for Prosperity Foundation v. Bonta, 594 U.S. 595, 606 (2021).

4. To be clear, Plaintiffs do not concede that altering the Judgment in this way would make its scope appropriate, and Plaintiffs retain their right to challenge all aspects of the Judgment on appeal. However, in the absence of the proposed amendment, Plaintiffs face an imminent deadline compelling the disclosure of their membership information.
5. To avoid the need for Plaintiffs to file an emergency motion to stay the disclosure deadline, the Parties respectfully request that the Court act on this motion by October 14, 2025.

Dated: October 10, 2025

Respectfully submitted,

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