

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
DUBLIN DIVISION**

CHRISTOPHER BAUGHUM, JR., et	)	
al.,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO. 3:21-cv-
v.	)	00036-DHB-BKE
	)	
GENOLA JACKSON, et	)	
al.,	)	
	)	
Defendants.	)	

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**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiffs file this notice of supplemental authority to advise the Court of *United States v. Jimenez-Shilon*, No. 20-13139, 2022 WL 1613203 (11th Cir. May 23, 2022) and *Jones v. Bonta*, No. 20-56174, 2022 WL 1485187 (9th Cir. May 11, 2022), both attached hereto.

In *Jimenez-Shilon*, Judge Newsom in concurrence advocated for the “text, history, and tradition” standard for which Plaintiffs have argued, *Jimenez-Shilon*, 1–5, and clarified that whether to adopt that approach remains an open question in this Circuit, *id.* 5–7; Pls.’ Reply in Supp. of Summ. J. at 20, Doc. 38 (Oct. 12, 2021) (“Reply”).

In *Jones*, the Ninth Circuit held that California’s general ban on 18-to-20-year-old adults acquiring centerfire rifles likely violates the Second Amendment. That case is persuasive authority here for several reasons.

First, the court conducted an in-depth review of the history of firearm rights and to demonstrate that “the historical record shows that the Second Amendment protects young adults’ right to keep and bear arms.” *Jones* at 22–30.

Second, at the second step of the analysis (which only is relevant if the Court applies a tiers-of-scrutiny approach), *Jones* supports Plaintiffs’ argument that under *Craig v. Boren*, 429 U.S. 190 (1976), any fit between 18-to-20-year-olds and the commission of violent crime is far too tenuous to support infringing the Second Amendment rights of members of that age group. *See Jones* at 49–50; Pls.’ Br. in Supp. of Summ. J. at 21–22, Doc. 20-2 (Aug. 24, 2021) (“Br.”).

Third, Judge Lee’s concurring opinion in *Jones* supports Plaintiffs’ arguments that the fit is particularly tenuous as applied to 18-to-20-year-old women, because “men almost exclusively commit violent crimes.” *Jones* at 72; Br. at 24–26.

May 31, 2021

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Respectfully Submitted,

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