

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division

LYNCHBURG RANGE & TRAINING, LLC, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 6:20-cv-00020-NKM
)	
HON. RALPH S. NORTHAM, <i>et al.</i> ,)	
)	
Defendants.)	
)	
)	

**PLAINTIFFS' EMERGENCY MOTION TO
REMAND CASE TO STATE COURT**

Plaintiffs, Lynchburg Range & Training, LLC, Virginia Citizens Defense League, Gun Owners of America, Inc., and Association of Virginia Gun Ranges, through undersigned counsel, hereby move this Court, pursuant to Rule 7, Federal Rules of Civil Procedure, for entry of an order remanding this proceeding to Circuit Court for the City of Lynchburg, and granting an award of costs, expenses, and attorneys' fees to plaintiffs.

For reason therefor, plaintiffs submit that plaintiffs' complaint does not contain a federal question over which this Court may exercise jurisdiction, and that defendants improperly filed their notice to remove, or in the alternative that the Court should abstain from exercising jurisdiction, as explained in the accompanying Memorandum of Points and Authorities in Support of this Emergency Motion for Removal. Plaintiffs request an expedited hearing, on an emergency basis, due to a scheduled injunction hearing in state court set for April 14, 2020 at 10:00 A.M.

Wherefore, plaintiffs pray that its motion be granted, and that this Court order the case be remanded to Circuit Court for the City of Lynchburg and award of costs, expenses, and attorneys' fees to plaintiffs.

Respectfully submitted,

By: /s/ David G. Browne

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Dated: April 13, 2020

Counsel for Plaintiffs

LYNCHBURG RANGE & TRAINING, LLC,
VIRGINIA CITIZENS DEFENSE LEAGUE, GUN
OWNERS OF AMERICA, INC., AND
ASSOCIATION OF VIRGINIA GUN RANGES

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of April 2020, a true and accurate copy of the foregoing Emergency Motion for Remand was filed via the ECF system and served thereby on all parties receiving notice via the ECF system.

/s/ David G. Browne