

STATE OF MICHIGAN
IN THE COURT OF APPEALS

On Remand from the Michigan Supreme Court

JOSHUA WADE,

Plaintiff-Appellant,

Court of Appeals No. 330555

v.

Court of Claims No. 15-00129

UNIVERSITY OF MICHIGAN,

Defendant-Appellee.

**MOTION BY GIFFORDS LAW CENTER TO PREVENT GUN VIOLENCE
AND THE CAMPAIGN TO KEEP GUNS OFF CAMPUS
FOR LEAVE TO FILE A BRIEF AS *AMICI CURIAE* IN SUPPORT OF
DEFENDANT-APPELLEE UNIVERSITY OF MICHIGAN**

Giffords Law Center to Prevent Gun Violence (“Giffords Law Center”) and The Campaign to Keep Guns Off Campus (“The Campaign”) hereby respectfully move this Court, pursuant to MCR 7.212(H) and this Court’s January 12, 2023 Order, for leave to file a brief as *amici curiae* in support of Defendant-Appellee University of Michigan. In support of this motion, Giffords Law Center and The Campaign state as follows:

1. Giffords Law Center is a non-profit policy organization serving lawmakers, advocates, legal professionals, gun violence survivors, and others who seek to reduce gun violence and improve the safety of their communities. The organization was founded nearly 30 years ago following a gun massacre at a San Francisco law firm and was renamed Giffords Law Center in 2017 after joining forces with the gun-safety organization led by former Congresswoman Gabrielle Giffords. Today, through partnerships with gun violence researchers, public health experts, and community organizations, Giffords Law Center researches, drafts, and defends the laws, policies, and programs proven to effectively reduce gun violence.

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2. The Campaign is a non-profit organization founded in 2008 and dedicated to promoting the safety of students, faculty, staff, and all other visitors to college, university, and other school campuses by helping to reduce the presence of concealed firearms on those campuses. The Campaign helps educate the general public, as well as college students, faculty, and staff, that learning environments are safer without the presence of firearms.

3. Giffords Law Center and/or The Campaign have contributed technical expertise and informed analysis as *amici* in numerous cases involving firearm regulations.

4. Giffords Law Center was previously granted leave to file a brief as *amicus curiae* before the Michigan Supreme Court in this case, MSC No. 156150.

5. Giffords Law Center and The Campaign support reasonable gun-safety regulations on university campuses. Both organizations believe that universities have a critical interest in maintaining a safe environment for their students, faculty, staff, and visitors. And the presence of guns on campus can cause fear, intimidation, and self-censorship—all of which are antithetical to fostering an environment in which members of the university community can freely and openly exchange ideas.

6. Giffords Law Center and The Campaign intend to file a brief as *amici curiae* that will assist the Court by explaining the many reasons why universities have consistently restricted guns on campus since the Founding.

7. Giffords Law Center and The Campaign anticipate that other interested organizations may also sign on to their brief.

WHEREFORE, Giffords Law Center and The Campaign respectfully request that this Court enter an order granting them leave to file a brief as *amici curiae* in support of Defendant-Appellee University of Michigan.

Dated: February 16, 2023

Respectfully submitted,

By: /s/ Amanda K. Rice

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PROOF OF SERVICE

I certify that on February 16, 2023, I electronically filed the foregoing document with the Clerk of the Court using the MiFILE system, which will send notification of such filing to the following counsel of record:

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