

IN THE FIFTH DISTRICT COURT OF APPEALS
DELAWARE COUNTY, OHIO

JOHN DOE 1, et al.,)	CASE NO: 23 CAE 04 0028
)	
Plaintiffs-Appellees,)	
)	On Appeal from the Delaware
vs.)	County Court of Common Pleas
)	CASE NO: 23-cv-H-02-0089
CITY OF COLUMBUS, et al.,)	
)	
Defendants-Appellants.)	
)	

NOTICE OF ADDITIONAL AUTHORITY

Pursuant to App.R. 21(I), Plaintiffs-Appellees present additional case authority to the Court relevant to this matter but not cited in the briefs because the cases were decided after the completion of the briefing. *Duncan v. Bonta*, No. 17-cv-1017-BEN, 2023 WL 6180472 (S.D.Cal. Sept. 22, 2023) (The previous Ninth Circuit opinions in this case are discussed in the parties' briefs. On remand, the District Court again struck down California's large-capacity magazine ban); *Columbus v. State*, 2023-Ohio-2858 (10th Dist.) (finding the Franklin County Court of Common Pleas' preliminary injunction of R.C. 9.68 improper); Decision & Entry, *West v. Cincinnati*, Hamilton C.P. No. A2303087 (Sept. 7, 2023) (striking down Cincinnati's safe storage ordinance as it is "specifically preempted" by R.C. 9.68).

Respectfully submitted,
/s/ David C. Tryon
David C. Tryon (0028954)
Robert Alt (0091753)
Jay R. Carson (0068526)
Alex M. Certo (0102790)
The Buckeye Institute
88 East Broad Street, Suite 1300
Columbus, Ohio 43215
(614) 224-4422
Email: d.tryon@buckeyeinstitute.org

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Attorneys for Plaintiffs-Appellees

CERTIFICATE OF SERVICE

This will certify that a true and accurate copy of the foregoing Notice of Additional Authority has been served by email this 6th day of October 2023.

/s/ David C. Tryon
David C. Tryon (0028954)