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DAUPHIN COUNTY  
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Frank J. Lavery, Esquire  
Pennsylvania Bar No. 42370  
Joshua M. Autry, Esquire  
Pennsylvania Bar No. 208459  
225 Market Street, Suite 304  
P.O. Box 1245, Harrisburg, PA 17108-1245  
(717) 233-6633 (phone)  
(717) 233-7003 (fax)  
[flavery@laverylaw.com](mailto:flavery@laverylaw.com)  
[jautry@laverylaw.com](mailto:jautry@laverylaw.com)  
Attorneys for Defendants

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IN THE COURT OF COMMON PLEAS OF THE 12<sup>TH</sup> JUDICIAL DISTRICT  
DAUPHIN COUNTY, PENNSYLVANIA

U.S. Law Shield of Pennsylvania, : 2015-cv-255  
Ex rel. Todd Hoover; and John Bruno, :  
Plaintiffs : Civil Action – Equity  
v. :  
City of Harrisburg; Mayor Eric Papenfuse; : Jury Trial Demanded  
Wanda Williams, Sandra Reid, :  
Brad Koplinski, Ben Alatt, Jeff Baltimore, :  
Susan Wilson, Shamaine Daniels, :  
Harrisburg City Council Members; and :  
Chief of Police Thomas Carter, :  
Defendants :

Concise Statement of Matters Complained of on Appeal

All Defendants raise the following questions on appeal:

1. Does the preliminary injunction against ordinances enacted in 1951, 1969, and 1990 change the status quo? Yes.
2. Are Plaintiffs likely to prevail? No.
3. Did Plaintiffs present any evidence that Harrisburg has ever harmed them or will harm them? No.

4. Does Act 192 violate the single subject and original purpose rules of the Pennsylvania Constitution? Yes.

5. Does Act 192 violate the requirement under Pennsylvania's Constitution that a plaintiff show injury? Yes.

6. Does the Uniform Firearms Act prohibit Harrisburg's minors, emergency, or parks ordinances? No.

7. Does the Uniform Firearms Act bar Harrisburg from regulating *unlawful* carrying of firearms? No.

8. Does the Third Class City Code authorize Harrisburg to prevent discharge, prevent concealed carry, manage public property, take reasonable measures to protect the public during an emergency, and take reasonable measures to protect the public in general? Yes.

9. Under the Third Class City Code, can Harrisburg negate statutory exceptions for hunting (children) and concealed carry (parks and emergencies)? Yes.

10. Must ordinances contain textual self-defense exceptions given the statutory, common law, and constitutional right to self-defense? No.

11. Is the gun ban in Harrisburg's parks consistent with the gun ban at state parks? Yes.

Respectfully submitted,

Lavery Law

A handwritten signature in black ink, appearing to read 'Frank J. Lavery', written over a horizontal line.

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(717) 233-6633 (phone)  
(717) 233-7003 (fax)  
[flavery@laverylaw.com](mailto:flavery@laverylaw.com)  
[jautry@laverylaw.com](mailto:jautry@laverylaw.com)  
Attorneys for Defendants

Dated: April 17, 2015