

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SHELLY PARKER, et al.,	)	Case No. 03-CV-0213-EGS
	)	
Plaintiffs,	)	<b>DECLARATION OF</b>
	)	<b>ALAN GURA</b>
v.	)	
	)	
DISTRICT OF COLUMBIA, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF ALAN GURA**

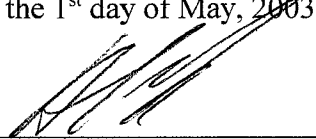
I, Alan Gura, am competent to state, and if called upon would testify to the following based on my personal knowledge:

1. I am counsel for plaintiffs in the above-captioned matter.
2. Mr. Halbrook never sought to meet and confer with me or any of my co-counsel prior to filing the motion to consolidate or the Seegers action.
3. On April 10, 2003, Halbrook, Robert Levy and I met to discuss the situation.
4. During the meeting, it became obvious that the two sides had numerous substantive differences about how to approach this litigation. For his part, Halbrook seemed unconcerned with delaying relief in Parker. Asked bluntly what benefit he saw to consolidation, Halbrook explained that the NRA wants him, in particular, to argue this case, and Halbrook and NRA believe that he is a better attorney, or better for our case, than we are. Halbrook added that filing Seegers and seeking consolidation was a means to assure him argument at the Court of Appeals. Halbrook further stated that he and the NRA would not be satisfied with merely submitting an *amicus curiae* brief. According to Halbrook, the Circuit Court might ignore his

*amicus* brief, but it would be forced to listen to him at argument if the cases were consolidated. We requested, at a minimum, Halbrook and his associate Gardiner recuse themselves or withdraw the motion to consolidate, thereby minimizing their adversity to Parker. Halbrook requested more time to consider the matter, but has since rejected our request.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 1<sup>st</sup> day of May, 2003



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Alan Gura