

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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|-------------------------------|---|-------------------------|
| TOM G. PALMER, et al., |) | Case No. 09-CV-1482-FJS |
| |) | |
| Plaintiffs, |) | REPLY BRIEF RE: |
| |) | STANDING |
| v. |) | |
| |) | |
| DISTRICT OF COLUMBIA, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

REPLY BRIEF RE: STANDING

Although Defendants take issue with SAF’s *organizational* standing, they do not contest that SAF has *representational* standing. That much appears conceded. Defendants also concede the rule that “where at least one plaintiff has standing, a court need not decide whether any other plaintiffs have standing.” Def. Br., 10/4/12, Dkt. 39, at 1 (citations omitted). Nor do Defendants question that any of the individual plaintiffs have standing.

Accordingly, while the parties may have an abstract dispute about organizational standing, belaboring the topic would be pointless. Even if SAF lacked organizational standing, it would remain a plaintiff in its representative capacity. There is no need to issue an advisory opinion in this disputed area, particularly as SAF seeks no relief in this case different than that sought by the individual plaintiffs, and that which would be available to other SAF members.

Dated: October 4, 2012

Respectfully submitted,

Alan Gura (D.C. Bar No. 453449)
Gura & Possessky, PLLC
101 N. Columbus Street, Suite 405
Alexandria, VA 22314
703.835.9085/Fax 703.997.7665

By: /s/Alan Gura
Alan Gura