

No. 12-14009

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

DR. BERND WOLLSCHLAEGER, *et al.*,
Plaintiffs-Appellees,

v.

GOVERNOR OF THE STATE OF FLORIDA, *et al.*,
Defendants-Appellants.

On Appeal from the United States District Court
for the Southern District of Florida
No. 1:11-cv-22026-MCG (Hon. Marcia G. Cooke)

**MOTION FOR LEAVE TO FILE EN BANC BRIEF OF *AMICUS CURIAE*
THE AMERICA PROFESSIONAL SOCIETY ON THE ABUSE OF
CHILDREN IN SUPPORT OF PLAINTIFFS-APPELLEES AND
AFFIRMANCE**

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April 27, 2016

Wollschlaeger et al. v. Governor of the State of Florida et al., No. 12-14009

Certificate of Interested Persons and Corporate Disclosure Statement

Pursuant to 11th Circuit Rule 26.1-1, undersigned counsel certifies that, in addition to the persons and entities identified in the briefs submitted to date in this appeal, the following persons may have an interest in the outcome of this case:

Amicus curiae

American Professional Society on the Abuse of Children

Counsel for *amicus curiae*

Arnold & Porter LLP

Khoshkhoo, Neda

Perdue, William

Weiner, David J.

Undersigned counsel further certifies that APSAC has no parent corporation and that no publicly held corporation owns 10 percent or more of its stock.

April 27, 2016

/s/ David J. Weiner

David J. Weiner

Counsel for the American

*Professional Society on the Abuse of
Children*

Motion for Leave to File En Banc *Amicus Curiae* Brief

The American Professional Society on the Abuse of Children (“APSAC”) respectfully moves under Federal Rule of Appellate Procedure 29 and Eleventh Circuit Rule 35-9 for leave to file an *amicus curiae* brief in support of the plaintiffs-appellees and affirmance.

APSAC is the leading national organization for professionals who serve children and families affected by child maltreatment, including abuse and neglect. A multidisciplinary group of professionals, APSAC achieves its mission through expert training and educational activities, policy leadership and collaboration, and consultation that emphasizes theoretically sound, evidence-based principles. APSAC is a 28-year-old organization that has played a central role in developing professional guidelines that address child maltreatment.

APSAC’s proposed brief, which accompanies this motion, addresses the effects the Firearm Owners’ Privacy Act will have on the health and wellbeing of Florida’s children if the law is allowed to go into effect. The proposed brief also explains how this Court should take the law’s effects on children into account when evaluating the law’s constitutionality under the First Amendment.

No party’s counsel authored the proposed brief in whole or in part. No party or a party’s counsel made a monetary contribution intended to fund the preparation or submission of the proposed brief, and no person other than *amicus curiae* or its

counsel made such a monetary contribution. The parties have consented to the filing of the proposed brief.

CONCLUSION

For the foregoing reasons, the Court should grant APSAC's motion for leave to file an en banc *amicus curiae* brief.

Dated: April 27, 2016

Respectfully submitted,

/s/ David J. Weiner

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CERTIFICATE OF SERVICE

I hereby certify that, on April 27, 2016, I electronically filed the foregoing motion with the Clerk of the Court by using the Court's CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Dated: April 27, 2016

Respectfully submitted,

/s/ David J. Weiner

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