



CITY OF PHILADELPHIA

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November 18, 2020

Via Email

The Honorable Edward C. Wright
Court of Common Pleas of Philadelphia County
229B City Hall
Philadelphia, PA 19107

Re: *Gun Owners of America, Inc., et al., v. City of Philadelphia and Commissioner Danielle Outlaw*
Court of Common Pleas, Philadelphia County, Civil Trial Division
October Term 2020, No. 0130

Dear Judge Wright:

We represent the City and Police Commissioner Danielle Outlaw in the above captioned matter. We write to update the Court regarding Philadelphia Police Department's Gun Permit Unit ("GPU") and its current operations. As of today, November 18, 2020, the Gun Permit Unit was informed that at least two of its personnel, a police officer and a detective, have tested positive for COVID-19. The two COVID-19 positive individuals have had exposure to the remainder of the GPU's personnel, who must quarantine according to City, Commonwealth and CDC guidelines. The Police Department is unable to immediately reassign staff to the GPU, as all officers are required to receive 30 days' notice before their assignments are changed, pursuant to their labor contract. In an effort to stop the spread of the virus within PPD, prevent the GPU from becoming a possible super spreader location, and protect the health, safety and welfare of the public, the GPU has closed and plans to reopen to the public on December 7, 2020.

If the Court deems it appropriate, Defendants would be happy to provide an affidavit from PPD personnel testifying to the above conditions as a supplement to their November 9th Response in Opposition to Plaintiff's Motion for Peremptory Judgment. Alternatively, if the Court believes a hearing would best resolve the issues presented, a PPD representative is available to testify about its current operations due to the recent positive COVID-19 test results. We will await further instruction from the Court as to how to proceed.

Respectfully,

A handwritten signature in cursive script that reads "Lydia Furst".

Lydia Furst, Deputy City Solicitor

cc: Andrew Austin, Esquire (*via email*)