

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION

PEOPLE OF THE STATE OF NEW YORK,
BY LETITIA JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK.

Plaintiff,

V.

THE NATIONAL RIFLE ASSOCIATION
OF AMERICA, INC., WAYNE LAPIERRE,
WILSON PHILLIPS, JOHN FRAZER, and
JOSHUA POWELL.

Defendants.

Index No. 451625/2020

Part 3

Hon. Joel M. Cohen

**DEMAND UNDER CPLR RULE 511(b) FOR CHANGE OF PLACE OF TRIAL
ON THE GROUND THAT THE COUNTY DESIGNATED FOR THAT PURPOSE
IS NOT A PROPER COUNTY**

PLEASE TAKE NOTICE that Defendant The National Rifle Association of America hereby demands, pursuant to CPLR Rule 510, subdivisions (1) and (3), and CPLR Rule 511, subdivisions (a) and (b), that the place of trial of the above-entitled action be changed from New York County, in which it has been improperly placed, to Albany County, where venue would be proper, as required by N-PCL § 1110.

Dated: October 19, 2020

Respectfully submitted,

**BREWER, ATTORNEYS &
COUNSELORS**

By:

William A. Brewer III

wab@brewerattorneys.com

Sarah B. Rogers

sbr@brewerattorneys.com

750 Lexington Avenue, 14th Floor

New York, New York 10022

Telephone: (212) 489-1400

Facsimile: (212) 751-2849

ATTORNEYS FOR DEFENDANT