

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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.

x Index No. 451625/2020
: (Cohen, J.)
:
:

: **AFFIRMATION OF SETH C.**
: **FARBER IN SUPPORT OF**
: **MOTION FOR ADMISSION**
: **PRO HAC VICE**
:
:

x

SETH C. FARBER, an attorney admitted to practice in the courts of the State of New York,
and not a party to this action, hereby affirms the following to be true under the penalties of perjury,
pursuant to CPLR § 2106:

1. I am a partner with the law firm Winston & Strawn LLP, attorneys of record for Defendant Wilson Phillips in the above-captioned action. I am a member in good standing of the New York bar. Pursuant to 22 N.Y.C.R.R. § 520.11 and 22 N.Y.C.R.R. § 1250.4, I submit this affirmation in support of my client's application for an order granting Mark S. Werbner and Elyse J. Lyons admission *pro hac vice* to appear and participate in this action on his behalf.

2. Annexed hereto is the Affidavit of Mark S. Werbner, sworn to on October 22, 2020. Mr. Werbner is a partner at Winston & Strawn LLP, 2121 North Pearl Street, Suite 900, Dallas, Texas 75201. As set forth in his affidavit, Mr. Werbner is licensed to practice law before the courts of the State of Texas, and is a member in good standing of the Bar of the State of Texas. He has never been disciplined by any court, and no disciplinary proceedings are pending against him. Annexed to his affidavit is a certificate of good standing of the Bar of the State of Texas.

3. Mr. Werbner is familiar with the facts of the above-captioned action. The interests of the client and of judicial economy support Mr. Werbner's admission *pro hac vice*.

4. Mr. Werbner is familiar with and will comply with the standards of professional conduct imposed upon members of the New York Bar, including the Rules of Court governing the conduct of attorneys and the Rules of Professional Conduct.

5. Mr. Werbner agrees to be subject to the jurisdiction of the Courts of the State of New York with respect to any acts occurring during the course of his participation in this matter.

6. Also annexed hereto is the Affidavit of Elyse J. Lyons, sworn to on October 22, 2020. Ms. Lyons is an associate at Winston & Strawn LLP, 2121 N. Pearl Street, Suite 900, Dallas, Texas 75201. As set forth in her affidavit, Ms. Lyons is licensed to practice law before the courts of the State of Texas, and is a member in good standing of the Bar of the State of Texas. She has never been disciplined by any court, and no disciplinary proceedings are pending against her. Annexed to her affidavit is a certificate of good standing of the Bar of the State of Texas.

7. Ms. Lyons is familiar with the facts of the above-captioned action. The interests of the client and of judicial economy support Ms. Lyons's admission *pro hac vice*.

8. Ms. Lyons is familiar with and will comply with the standards of professional conduct imposed upon members of the New York Bar, including the Rules of Court governing the conduct of attorneys and the Rules of Professional Conduct.

9. Ms. Lyons agrees to be subject to the jurisdiction of the Courts of the State of New York with respect to any acts occurring during the course of her participation in this matter.

10. Annexed hereto is a proposed Order granting this motion.

11. No prior application has been made for the relief sought herein in connection with the above-captioned action.

12. WHEREFORE, for the reasons set forth herein, my client respectfully requests that this motion be granted, and that Mark S. Werbner and Elyse J. Lyons be admitted *pro hac vice* to appear and participate in this action on his behalf, and for such other relief as this Court deems just and proper.

Dated: October 26, 2020
New York, New York

s/ Seth C. Farber
Seth C. Farber