

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

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PEOPLE OF THE STATE OF NEW YORK, BY :
LETITIA JAMES, ATTORNEY GENERAL OF :
THE STATE OF NEW YORK, : Index No. 451625/2020

Plaintiff, : IAS Part 3

v. : Hon. Joel M. Cohen

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

Defendants. :
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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Defendant John Frazer's Motion to Dismiss or Stay, upon the motion to dismiss dated October 19, 2020, submitted by Defendant The National Rifle Association (NYSCEF Doc. No. 99) including all supporting papers submitted therewith, and upon all other papers, pleadings, and proceedings in this action, Defendant John Frazer, by his undersigned attorneys, will move this Court, before the Honorable Joel M. Cohen, at the Supreme Court of the State of New York, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, New York 10007 at 9:30 a.m. on Thursday, November 19, 2020, for an Order:

1. Pursuant to CPLR 327(a), dismissing this action on the basis of *forum non conveniens*;
2. Pursuant to CPLR 3211(a)(4), dismissing or staying this action because of pending litigation between the parties;

3. Pursuant to CPLR 3211(a)(1), dismissing or transferring based on the existence of documentary evidence;

4. Pursuant to CPLR 2201, staying this action pending the resolution of related federal cases; and

5. Granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's direction, reply papers, if any, must be served upon the undersigned on or before November 12, 2020.

Dated: New York, New York
October 30, 2020

CARL D. LIGGIO, SR., ESQ.

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To: PEOPLE OF THE STATE OF
NEW YORK, by LETITIA JAMES,
Attorney General of the State of New York (via NYSCEF)