NYSCEF DOC. NO. 131

INDEX NO. 451625/2020

RECEIVED NYSCEF: 10/30/2020

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK: IAS PART THREE

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

Index No. 451625/2020

Hon. Joel M. Cohen

Plaintiff,

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

Defendants.

## 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 Wayne LaPierre hereby demands, pursuant to CPLR § 510, subdivision (1), 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: New York, New York October 30, 2020

CORRELL LAW GROUP

By:

P. Kent Correll

250 Park Avenue, 7th Floor New York, New York 10177

Tel: (212) 475-3070 Fax: (212) 409-8515

E-mail: kent@correlllawgroup.com

Attorney for Defendant Wayne LaPierre