

Motion Sequence 007

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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**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT
JOHN FRAZER'S MOTION TO TRANSFER VENUE**

Defendant John Frazer ("Frazer"), by and through his attorneys Carl D. Liggio, Esq. and Gage Spencer & Fleming LLP, respectfully submits this memorandum of law in support of his motion pursuant to Civil Practice Law & Rules ("CPLR") 511(b) and the New York Not-for-Profit Corporation Law ("N-PCL") Article 11 to transfer venue from New York County to Albany County. In consideration of the Court's expressed wish that a party avoid duplicating arguments made in other parties' briefs (*see, e.g.*, NYSCEF Doc. No. 153), Frazer joins in the motions to transfer venue submitted by Defendant The National Rifle Association (NYSCEF Doc. Nos. 133-141) and by Defendant Wayne LaPierre (NYSCEF Doc. Nos. 156-169) (collectively, the "Motions to Transfer Venue"). For the reasons set forth in the Motions to Transfer Venue, which reasons Frazer expressly incorporates by reference and adopts herein as his own, Frazer's motion to transfer venue should be granted.

Dated: New York, New York
November 12, 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)

**CERTIFICATION OF COUNSEL OF
COMPLIANCE WITH APPLICABLE WORD LIMITS**

Pursuant to Commercial Division Rule 17 (22 NYCRR 220.70), I hereby certify that this Memorandum of Law in Support of Defendant John Frazer's Motion to Transfer Venue contains 343 words excluding this Certification, and therefore complies with the 7,000-word limit applicable to memoranda of law.

Dated: New York, New York
November 12, 2020

/s/ William B. Fleming

William B. Fleming