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NYSCEF DOC. NO. 170

INDEX NO. 451625/2020

RECEIVED NYSCEF: 11/13/2020

Motion Sequence 007

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,

Index No. 451625/2020

IAS Part 3

:

Hon. Joel M. Cohen v.

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

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon 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), all other papers, pleadings, and proceedings in

this action, and pursuant to the scheduling Order entered by the Court (see NYSCEF Doc. No.

153), Defendant John Frazer ("Frazer"), by and through his attorneys Carl D. Liggio, Esq. and

Gage Spencer & Fleming LLP, will move this Court, before the Honorable Justice Joel M.

Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60

Centre Street, New York, New York 10007 at 9:30 a.m. on Monday, January, 4 2021, for an

Order:

1. Transferring this action to Albany County because this action is one for dissolution and the principal office of the NRA is in Albany County; and

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

Dated: New York, New York

November 13, 2020

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FILED: NEW YORK COUNTY CLERK 11/12/2020 09:45 PM

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CARL D. LIGGIO, SR., ESQ.

By: /s/ Carl D. Liggio

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 ${\it Co-counsel for Defendant John Frazer}$

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By: /s/ William B. Fleming

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Email: <u>wfleming@gagespencer.com</u> Co-counsel for Defendant John Frazer

To: PEOPLE OF THE STATE OF

NEW YORK, by LETITIA JAMES,

Attorney General of the State of New York (via NYSCEF)