

Motion Sequence 006

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,	:
	:
Plaintiff,	:
	:
v.	:
	:
THE NATIONAL RIFLE ASSOCIATION	:
OF AMERICA, INC., WAYNE LAPIERRE,	:
WILSON PHILLIPS, JOHN FRAZER, and	:
JOSHUA POWELL,	:
	:
Defendants.	:
-----X	

Index No. 451625/2020

IAS Part 3

Hon. Joel M. Cohen

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Affirmation of P. Kent Correll, Esq. dated November 12, 2020, and exhibits annexed thereto, the accompanying Memorandum of Law in Support of Defendant Wayne LaPierre's Motion for Change of Place of Trial and for a Stay of Proceedings Pursuant to CPLR 510(1) and 511(c) dated November 12, 2020, the motion to transfer venue dated November 3, 2020, submitted by Defendant The National Rifle Association of America (the "NRA"), including all supporting papers submitted therewith (NYSCEF Doc. Nos. 133-41), and all other papers, pleadings and proceedings in this action, Defendant Wayne LaPierre, by his undersigned attorney, will move this Court, before the Honorable 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) pursuant to CPLR 510(1), changing the place of trial of this action from New York County, in which it has been improperly placed, to Albany County, where venue would be

proper, as required by Section 1110 of the New York Not-for-Profit Corporation Law, because this action has been brought under Article 11 of the New York Not-for-Profit Corporation Law seeking judicial dissolution of the NRA and the office the location of which was stated in the certificate of incorporation of the NRA at the time of the service on the NRA of a summons in this action was 80 State Street, Albany, New York, which is located in Albany County;

(2) pursuant to CPLR 511(c), granting a stay of proceedings for the purpose of changing the place of trial; and

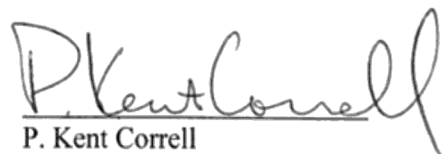
(3) granting such other, further and/or different relief as to the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's Order of November 10, 2020 (NYSCEF Doc. No. 153), responsive papers, if any, must be served upon the undersigned on or before December 10, 2020.

Dated: New York, New York
November 13, 2020

CORRELL LAW GROUP

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Attorney for Defendant Wayne LaPierre

TO: PEOPLE OF THE STATE OF NEW YORK,
BY LETITIA JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK
(via NYSCEF)