

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK, COMMERCIAL DIVISION**

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,

FRANCIS TAIT, JR., and MARIO AGUIRRE,
individually and derivatively on behalf of THE
NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC.,

Intervenors-Defendants,
Cross Claimants, and
Counter Claimants.

Index No. 451625/2020

Hon. Joel M. Cohen

Part 3

**AFFIRMATION OF TAYLOR
BARTLETT IN SUPPORT OF
MOTION FOR ADMISSION
*PRO HAC VICE***

TAYLOR BARTLETT, an attorney duly admitted to practice before the Courts of this State, affirms the following under penalty of perjury:

1. I am an attorney and partner at Heninger Garrison Davis, LLC, one of the counsel of record for the proposed Intervenors, Francis “Frank” Tait, Jr. and Mario Aguirre, in the above-captioned action. I respectfully submit this affirmation in support of Intervenors’ application to admit George C. Douglas, Jr., Esq. of Hoover, Alabama as counsel *pro hac vice* to represent the Intervenors in this action.

2. Mr. Douglas is familiar with this action. Mr. Douglas is a member in good

standing of the Alabama State Bar and is admitted to practice in the courts of the State of Alabama. A Certificate of Good Standing is attached to his accompanying affidavit.

3. As set forth in Mr. Douglas's affidavit, he is familiar with and will comply with the standards of professional conduct imposed upon members of the New York Bar, including the Rules of Court governing the conduct of attorneys and the Rules of Professional Conduct, and agrees to be subject to the jurisdiction of the Courts of the State of New York with respect to any acts occurring during the course of his participation in this matter. There are no disciplinary proceedings pending against Mr. Douglas in any jurisdiction, nor have there ever been any such proceedings against him in any jurisdiction. He will also notify this Court of any matter affecting his standing with the Alabama State Bar.

4. I will continue to be an attorney of record for the Intervenors in this action.

Accordingly the Intervenors respectfully request the Court to grant this application to admit Mr. Douglas *pro hac vice* to represent them in this action.

Dated: June 25, 2021

/s/ Taylor Bartlett

TAYLOR BARTLETT

CERTIFICATE OF WORD COUNT

Pursuant to Commercial Division Rule 17, I certify that the foregoing AFFIRMATION OF TAYLOR BARTLETT, which was prepared using Times New Roman 12-point typeface, contains 287 words, excluding the caption and signature block. This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 25, 2021
New York, New York

/s/ Taylor Bartlett

Taylor Bartlett