

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, :
:

v. :
:

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

Defendants. :
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Motion Sequence 011

**MEMORANDUM OF LAW OF JOHN FRAZER IN OPPOSITION TO MOTION TO
INTERVENE**

Defendant John Frazer (“Frazer”), by and through his attorneys Gage Spencer & Fleming LLP, respectfully submits this memorandum of law in opposition to the motion to intervene submitted by Francis Tait and Mario Aguirre (“Movants”), along with an Affidavit of John Frazer dated July 9, 2021. For the reasons set forth in the National Rifle Association of America’s Memorandum of Law in Opposition to Motion to Intervene (Motion Sequence 011), which Frazer joins, incorporates by reference, and adopts here, Movants’ motion to intervene should be denied.

Dated: New York, New York
July 9, 2021

GAGE SPENCER & FLEMING LLP

By: /s/ William B. Fleming
William B. Fleming
410 Park Avenue, Suite 810
New York, New York 10022

Tel. (212) 768-4900

Email: wflaming@gagespencer.com

Counsel for Defendant John Frazer

CERTIFICATE OF COMPLIANCE

I, William Fleming, an attorney duly admitted to practice law before the courts of the State of New York, certify that the Memorandum of Law of John Frazer in Opposition to the Motion to Intervene (Mot. Seq. 011) complies with the word count limit set forth in Rule 17 of the Commercial Division of the Supreme Court (22 NYCRR 202.70(g)) because the memorandum of law contains 98 words, excluding the parts exempted by Rule 17. In preparing this certification, I have relied on the word count of the word-processing system used to prepare the memorandum of law.

Dated: New York, New York
July 9, 2021

/s/ William B. Fleming

William B. Fleming