

**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 Francois Blaudeau, Esq. of Vestavia Hills, Alabama as counsel *pro hac vice* to represent the Intervenors in this action.

2. Mr. Blaudeau is familiar with this action. Mr. Blaudeau 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. Blaudeau'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. Blaudeau in any jurisdiction, nor have there ever been any such proceedings against him in any jurisdiction.

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. Blaudeau *pro hac vice* to represent them in this action.

Dated: July 14, 2021

*/s/ Taylor Bartlett*

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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: July 14, 2021  
New York, New York

*/s/ Taylor Bartlett*

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Taylor Bartlett