

**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**

**Motion Sequence # 011**

**AFFIRMATION OF TAYLOR  
BARTLETT**

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 the Reply Memorandum of Law in Support of Motion to Intervene by Francis Tait and Mario Aguirre (“Reply”) and to transmit to the Court certain key documents in this matter in support of the Reply.

2. A true and correct copy of the AG's Motion to Dismiss Chapter 11 is attached to the Reply as Exhibit 1.

*/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 354 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 20, 2021  
New York, New York

*/s/ Taylor Bartlett*

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Taylor Bartlett