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VIA: NYSCEF and KNARAM@nycourts.gov

Hon. Joel M. Cohen
Supreme Court, Civil Branch, New York County
60 Centre Street, Room 570
New York, NY 10007

Re: *People of the State of New York v. The National Rifle Association, et al.*,
Index No. 451625/2020

Dear Justice Cohen:

I am counsel of record for the proposed intervenors Francis Tait and Mario Aguirre. Yesterday, I learned that at least one, and possibly two, sitting directors of the NRA wish to join the motion to intervene. The motion is set for hearing next Thursday, September 9 at 2:30 p.m. I expect this director, or both, to assert the same claims made in the intervenors Proposed Answer, Cross, and Counter Claim (Doc. # 249), and also to assert that N-PCL § 720 provides an independent basis for a director's standing to assert these claims.

This issue has not been raised or briefed to date by the parties. I expect to file a supplemental memorandum of law and amended proposed pleading, and also expect the Attorney General and the Defendants to request additional time to respond. Accordingly, the intervenors bring this to the Court's attention now so that if Your Honor prefers, the hearing may be re-scheduled after filing and a reasonable time for all other parties' responses and replies. Of course, if Your Honor prefers to proceed with the hearing as scheduled, then the intervenors are prepared to do so, but I did not want this new development to first come to the Court's attention at the hearing.

Very Respectfully,

/s/ TAYLOR C. BARTLETT
Taylor C. Bartlett