

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X	
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.	:
-----X	

Index No. 451625/2020

**DEFENDANT JOHN FRAZER'S MEMORANDUM OF LAW IN OPPOSITION TO
MOTION TO INTERVENE BY ROSCOE B. MARSHALL, JR.**

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 Roscoe B. Marshall, Jr. ("Marshall") (NYSCEF Doc. Nos. 377, 397). To avoid duplication of arguments, Frazer joins in the Memorandum of Law of the National Rifle Association in Opposition to Motion to Intervene and supporting documents filed therewith (the "NRA Opposition") (NYSCEF Doc. Nos. 407-410). For the reasons set forth in the NRA Opposition, which reasons Frazer expressly incorporates by reference and adopts herein as his own, Marshall's Motion to Intervene should be denied.

Dated: New York, New York
October 18, 2021

GAGE SPENCER & FLEMING LLP

By: /s/ William B. Fleming
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Counsel for Defendant John Frazer

To: PEOPLE OF THE STATE OF
NEW YORK, by LETITIA JAMES,
Attorney General of the State of New York (via NYSCEF)

**CERTIFICATION OF COUNSEL OF
COMPLIANCE WITH APPLICABLE WORD LIMITS**

Pursuant to Commercial Division Rule 17 (22 NYCRR 202.70(g)), I hereby certify that Defendant John Frazer's Memorandum of Law in Opposition to Motion to Intervene is 252 words, and, therefore complies with the 7,000-word limit applicable the memoranda of law.

Dated: New York, New York
October 18, 2021

By: /s/ William B. Fleming
William B. Fleming