

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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**DEFENDANT JOHN FRAZER'S MEMORANDUM OF LAW IN OPPOSITION TO  
MOTION FOR REARGUMENT OF MOTION TO INTERVENE BY FRANCIS TAIT  
AND MARIO AGUIRRE**

Defendant John Frazer ("Frazer"), by and through his attorneys Gage Spencer & Fleming LLP, respectfully submits this memorandum of law in opposition to the motion for reargument of motion to intervene by Francis Tait and Mario Aguirre ("Motion for Reargument") (NYSCEF Doc. Nos. 400-401). To avoid duplication of arguments, Frazer joins in the Memorandum of Law of the National Rifle Association in Opposition to the Motion for Reargument (the "NRA Opposition") (NYSCEF Doc. No. 425). For the reasons set forth in the NRA Opposition, which reasons Frazer expressly incorporates by reference and adopts herein as his own, the Motion for Reargument should be denied.

Dated: New York, New York  
October 26, 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 258 words, and, therefore complies with the 7,000-word limit applicable the memoranda of law.

Dated: New York, New York  
October 26, 2021

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