

EXHIBIT A

REFORM, jntadm, LEAD, Sealed Document, CLOSED

**U.S. Bankruptcy Court
Northern District of Texas (Dallas)
Bankruptcy Petition #: 21-30085-hdh11**

Assigned to: Harlin DeWayne Hale
Chapter 11
Voluntary
Asset

Date filed: 01/15/2021
Date terminated: 06/07/2021
Debtor dismissed: 05/11/2021
341 meeting: 03/12/2021
Deadline for filing claims: 05/24/2021
Deadline for filing claims (govt.): 08/23/2021

Debtor disposition: Dismissed for Other Reason

Debtor

National Rifle Association of America
11250 Waples Mill Road
Fairfax, VA 22030
FAIRFAX (CITY)-VA
Tax ID / EIN: 53-0116130

represented by **Ryan Blaine Bennett**

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Filing Date	Docket Text
01/15/2021	<u>1</u> (16 pgs) Non-individual Chapter 11 Voluntary Petition. Fee Amount \$1738 Filed by National Rifle Association of America Chapter 11 Plan due by 05/17/2021. Disclosure Statement due by 05/17/2021. (Neligan, Patrick)
01/15/2021	Receipt of filing fee for Voluntary petition (chapter 11)(21-30085-11) [misc,volp11a] (1738.00). Receipt number 28419411, amount \$1738.00 (re: Doc# <u>1</u>). (U.S. Treasury)
01/18/2021	<u>2</u> (8 pgs; 2 docs) Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # <u>1</u> Proposed Order) (Neligan, Patrick)
01/18/2021	<u>3</u> (6 pgs; 2 docs) Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # <u>1</u> Proposed Order) (Neligan, Patrick)
01/18/2021	<u>4</u> (8 pgs; 2 docs) Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # <u>1</u> Exhibit A/Proposed Order) (Neligan, Patrick)
01/18/2021	<u>5</u> (20 pgs; 3 docs) Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # <u>1</u> Exhibit A/Proposed Order # <u>2</u> Exhibit B) (Neligan, Patrick)
01/18/2021	<u>6</u> (21 pgs; 2 docs) Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # <u>1</u> Exhibit A/Interim Order) (Neligan, Patrick)
01/18/2021	<u>7</u> (12 pgs; 2 docs) Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # <u>1</u> Exhibit A/Interim Order) (Neligan, Patrick)
01/18/2021	<u>8</u> (15 pgs; 2 docs) Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III)</i>

	<i>Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order) (Neligan, Patrick)
01/19/2021	9 (2 pgs) Notice of deficiency. Schedule A/B due 1/29/2021. Schedule D due 1/29/2021. Schedule E/F due 1/29/2021. Schedule G due 1/29/2021. Schedule H due 1/29/2021. Declaration Under Penalty of Perjury for Non-individual Debtors due 1/29/2021. Summary of Assets and Liabilities and Certain Statistical Information due 1/29/2021. Statement of Financial Affairs due 1/29/2021. Creditor matrix due 1/21/2021. (Whitaker, Sherri)
01/19/2021	10 (9 pgs) Declaration re: <i>Declaration of Shawn E. Soto in Support of Certain First Day Motions</i> filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> , 3 Notice of designation as complex chapter 11 case, 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 6 Motion to pay Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief, 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> , 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i>). (Neligan, Patrick)
01/19/2021	11 (4 pgs) Declaration re: <i>Declaration of Robert G. Owens in Support of Certain First Day Motions</i> filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> , 3 Notice of designation as complex chapter 11 case, 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 6 Motion to pay Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief, 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> , 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i>). (Neligan, Patrick)
01/19/2021	12 (8 pgs) Declaration re: <i>Declaration of Sonya A. Rowling in Support of Certain First Day Motions</i> filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> , 3 Notice of designation as complex chapter 11 case, 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 6 Motion to pay Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief, 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> , 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i>). (Neligan, Patrick)
01/19/2021	13 (4 pgs; 2 docs) Motion for expedited hearing(related documents 2 Motion for joint administration, 3 1st. Day - Notice of designation as complex chapter 11 case, 4 Motion to extend/shorten time, 5 First Day Motion, 6 Motion to pay, 7 Motion to pay tax debts, 8 First Day Motion) <i>Debtors' Motion for Emergency Consideration of Certain First Day Motions</i> Filed by Debtor National Rifle Association of America

	(Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #2, #3, #4, #5, #6, #7 SET FOR HEARING ON 1/20/21 AT 2:00 PM VIA WEBEX) Modified on 1/19/2021 (Bergreen, J.).
01/19/2021	14 (2 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order), 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). Hearing to be held on 1/20/2021 at 02:00 PM Dallas Judge Hale Ctrm for 3 and for 4 and for 6 and for 7 and for 5 and for 2 , (Neligan, Patrick)
01/19/2021	15 (1 pg) Notice of Appearance and Request for Notice by Laurie A. Spindler filed by Creditor Dallas County. (Spindler, Laurie)
01/19/2021	16 (4 pgs; 2 docs) DUPLICATE ENTRY RE - Motion for expedited hearing(related documents 2 Motion for joint administration, 3 1st. Day - Notice of designation as complex chapter 11 case, 4 Motion to extend/shorten time, 5 First Day Motion, 6 Motion to pay, 7 Motion to pay tax debts) <i>Debtors' Motion for Emergency Consideration of Certain First Day Motions</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) Modified on 1/21/2021 (Bergreen, J.).
01/19/2021	17 (3 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order), 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). Hearing to be held on 1/20/2021 at 02:00 PM Dallas Judge Hale Ctrm for 3 and for 4 and for 6 and for 7 and for 5 and for 2 , (Neligan, Patrick)
01/19/2021	18 (5 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order), 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit</i>

	<i>Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). Hearing to be held on 1/20/2021 at 02:00 PM Dallas Judge Hale Ctrm for 3 and for 4 and for 6 and for 7 and for 5 and for 2 , (Neligan, Patrick)
01/19/2021	19 (2 pgs) Support/supplemental document <i>Exhibit B to Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Alter, Refusing, or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> filed by Debtor National Rifle Association of America (RE: related document(s) 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i>). (Neligan, Patrick)
01/19/2021	20 (2 pgs) Notice of Appearance and Request for Notice by G. Michael Gruber filed by Mercury Group, Inc., Ackerman McQueen, Inc.. (Gruber, G.)
01/19/2021	21 (2 pgs) Notice of Appearance and Request for Notice by Brian Edward Mason filed by Ackerman McQueen, Inc., Mercury Group, Inc.. (Mason, Brian)
01/19/2021	22 (2 pgs) Notice of Appearance and Request for Notice by H Joseph Acosta filed by Ackerman McQueen, Inc., Mercury Group, Inc.. (Acosta, H)
01/19/2021	23 (3 pgs) Motion to appear pro hac vice for David Neier. Fee Amount \$100 Filed by Creditor Christopher Cox (Arbaugh, Natalie)
01/19/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-sgj11) [motion,mprohac] (100.00). Receipt number 28425076, amount \$ 100.00 (re: Doc# 23). (U.S. Treasury)
01/19/2021	24 (4 pgs) Motion to appear pro hac vice for Thomas M. Buchanan. Fee Amount \$100 Filed by Creditor Christopher Cox (Arbaugh, Natalie)
01/19/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-sgj11) [motion,mprohac] (100.00). Receipt number 28425114, amount \$ 100.00 (re: Doc# 24). (U.S. Treasury)
01/19/2021	25 (4 pgs) Notice of Appearance and Request for Notice by Natalie Lynn Arbaugh filed by Creditor Christopher Cox. (Arbaugh, Natalie)
01/19/2021	26 (3 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing to be Held on January 20, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> , 3 Notice of designation as complex chapter 11 case, 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> , 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i>). (Neligan, Patrick)
01/19/2021	27 (2 pgs) Notice of Agenda of Matters Scheduled for Hearing on January 20, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases

	21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order), 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). (Neligan, Patrick)
01/19/2021	28 (5 pgs) Certificate of service re: Certain First Day Motions filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> , 3 Notice of designation as complex chapter 11 case, 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> , 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i>). (Neligan, Patrick)
01/19/2021	29 (5 pgs) Certificate of service re: Motion Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices filed by Debtor National Rifle Association of America (RE: related document(s) 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i>). (Neligan, Patrick)
01/19/2021	30 (5 pgs) Certificate of service re: Motion to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions and Use of Existing Business Forms filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i>). (Neligan, Patrick)
01/20/2021	31 (15 pgs) Brief in support filed by Debtor National Rifle Association of America (RE: related document(s) 1 Voluntary petition (chapter 11)). (Neligan, Patrick)
01/20/2021	32 (22 pgs; 5 docs) Notice of Filing Revised Proposed Orders filed by Debtor National Rifle Association of America (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Neligan, Patrick)
01/20/2021	33 (3 pgs) Motion to appear pro hac vice for Sarah B. Rogers. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Collins, Michael)

01/20/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-sg)11) [motion,mprohac] (100.00). Receipt number 28428104, amount \$ 100.00 (re: Doc# 33). (U.S. Treasury)
01/20/2021	34 (1 pg) Notice of Appearance and Request for Notice by Tara LeDay filed by Creditor Denton County. (LeDay, Tara)
01/20/2021	35 (33 pgs) Creditor matrix . Filed by Debtor National Rifle Association of America (RE: related document(s) 9 Notice of deficiency). (Neligan, Patrick)
01/20/2021	36 (4 pgs) Order jointly administered lead case 21-30085 with member case(s) 21-30080. Sea Girt, LLC. An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of Texas directing joint administration of the chapter 11 cases of: Sea Girt LLC, Case No. 21-30080; and National Rifle Association of America, Case No. 21-30085. All further pleadings and papers shall be filed, and all further docket entries shall be made, in Case No. 21-30085 (RE: related document(s) 2 Motion for joint administration filed by Debtor National Rifle Association of America). Entered on 1/20/2021 (Rielly, Bill)
01/20/2021	42 Hearing held on 1/20/2021. (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	43 Hearing held on 1/20/2021. (RE: related document(s) 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order)) (DESIGNATED AS A COMPLEX CASE.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	44 Hearing held on 1/20/2021. (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; AGREEMENT REACHED WITH U.S. TRUSTEE; GRANTED.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	45 Hearing held on 1/20/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED ON AN INTERIM BASIS.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	46 Hearing held on 1/20/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	47 Hearing held on 1/20/2021. (RE: related document(s) 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 01/21/2021)
01/20/2021	87 (2 pgs) Court admitted exhibits date of hearing 01/20/2021. DECLARATIONS FILED AT DKT #10, DKT #11 AND DKT #12 ADMITTED. (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order), 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America

	(Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)) (Green, Shanette) (Entered: 02/01/2021)
01/21/2021	37 (1 pg) Clerk's correspondence requesting Verification of matrix cover sheet, Form BTXN094 from attorney for debtor. (RE: related document(s) 35 Creditor matrix . Filed by Debtor National Rifle Association of America (RE: related document(s) 9 Notice of deficiency).) Responses due by 1/28/2021. (Kerr, S.)
01/21/2021	38 (1 pg) Creditor matrix <i>Verification of Mailing List</i> . Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
01/21/2021	39 (1 pg) Order granting motion to appear pro hac vice adding David Neier for Christopher Cox (related document # 23) Entered on 1/21/2021. (Bradden, T.)
01/21/2021	40 (1 pg) Order granting motion to appear pro hac vice adding Thomas M. Buchanan for Christopher Cox (related document # 24) Entered on 1/21/2021. (Bradden, T.)
01/21/2021	41 (3 pgs) Interim order authorizing the debtor's to pay pre-petition employee wages, compensation, and employee benefits and granting related relief (related document # 6) Entered on 1/21/2021. (Bradden, T.)
01/21/2021	48 Request for transcript regarding a hearing held on 1/20/2021. The requested turn-around time is daily (Green, Shanette)
01/21/2021	49 (4 pgs; 2 docs) Motion to appear pro hac vice for Michael I. Baird. Fee Amount \$100 Filed by Creditor Pension Benefit Guaranty Corporation (Attachments: # 1 Certificate of Service) (Baird, Michael)
01/21/2021	50 (2 pgs) Interim Order granting 4 Motion to extend time. (Re: related document(s) 9 Notice of deficiency) Schedule A/B due 2/15/2021 for 9 , Schedule D due 2/15/2021 for 9 , Schedule E/F due 2/15/2021 for 9 , Schedule G due 2/15/2021 for 9 , Schedule H due 2/15/2021 for 9 , Statement of Financial Affairs due 2/15/2021 for 9 , Summary of Assets and Liabilities and Certain Statistical Information due 2/15/2021 for 9 , Declaration Under Penalty of Perjury for Non-individual Debtors due 2/15/2021 for 9 , Entered on 1/21/2021. (Bradden, T.)
01/21/2021	51 (3 pgs) Interim Order granting motion to pay certain pre-petition taxes (related document # 7) Entered on 1/21/2021. (Bradden, T.)
01/21/2021	52 (5 pgs) Interim Order authorizing the debtor's to continue use of existing cash management system, maintain existing bank accounts, pay certain costs and fees associated with credit card transactions, and continue use of existing business forms (related document # 5) Entered on 1/21/2021. (Bradden, T.)
01/21/2021	53 (4 pgs) Order granting complex chapter 11 treatment. Entered on 1/21/2021 (Bradden, T.)
01/21/2021	54 (3 pgs) BNC certificate of mailing. (RE: related document(s) 9 Notice of deficiency. Schedule A/B due 1/29/2021. Schedule D due 1/29/2021. Schedule E/F due 1/29/2021. Schedule G due 1/29/2021. Schedule H due 1/29/2021. Declaration Under Penalty of Perjury for Non-individual Debtors due 1/29/2021. Summary of Assets and Liabilities and Certain Statistical Information due 1/29/2021. Statement of Financial Affairs due 1/29/2021. Creditor matrix due 1/21/2021.) No. of Notices: 1. Notice Date 01/21/2021. (Admin.)

01/22/2021	55 (50 pgs) Transcript regarding Hearing Held 01/20/2021 RE: First Day Motions (50 pgs.). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 04/22/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 42 Hearing held on 1/20/2021. (RE: related document(s) 2 Motion for joint administration of cases 21-30080 and 21-30085 <i>Debtors' Emergency Motion for an Order Directing The Joint Administration of Chapter 11 Cases</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.), 43 Hearing held on 1/20/2021. (RE: related document(s) 3 Notice of designation as complex chapter 11 case filed by Debtor National Rifle Association of America. (Attachments: # 1 Proposed Order)) (DESIGNATED AS A COMPLEX CASE.), 44 Hearing held on 1/20/2021. (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; AGREEMENT REACHED WITH U.S. TRUSTEE; GRANTED.), 45 Hearing held on 1/20/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED ON AN INTERIM BASIS.), 46 Hearing held on 1/20/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.), 47 Hearing held on 1/20/2021. (RE: related document(s) 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.)). Transcript to be made available to the public on 04/22/2021. (Rehling, Kathy)
01/22/2021	56 (4 pgs; 2 docs) Motion to appear pro hac vice for Faheem A. Mahmooth. Fee Amount \$100 Filed by Creditor Pension Benefit Guaranty Corporation (Attachments: # 1 Certificate of Service) (Mahmooth, Faheem)
01/22/2021	57 (1 pg) Order granting motion to appear pro hac vice adding Sarah B. Rogers for National Rifle Association of America (related document # 33) Entered on 1/22/2021. (Bradden, T.)
01/22/2021	58 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America Related document(s) 4 Motion to extend time to file schedules 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)). Hearing to be held on 2/10/2021 at 02:00 PM Dallas Judge Hale Ctrm for 8 and for 6 and for 5 4 7 . (Neligan, Patrick). MODIFIED to create linkage on 1/25/2021 (Cumby, C).
01/23/2021	59 (3 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 39 Order granting motion to appear pro hac vice adding David Neier for Christopher Cox (related document 23) Entered on 1/21/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 01/23/2021. (Admin.)
01/23/2021	60 (3 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 40 Order granting

	motion to appear pro hac vice adding Thomas M. Buchanan for Christopher Cox (related document 24) Entered on 1/21/2021. (Bradden, T.) No. of Notices: 2. Notice Date 01/23/2021. (Admin.)
01/23/2021	61 (7 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 52 Interim Order authorizing the debtor's to continue use of existing cash management system, maintain existing bank accounts, pay certain costs and fees associated with credit card transactions, and continue use of existing business forms (related document 5) Entered on 1/21/2021. (Bradden, T.) No. of Notices: 5. Notice Date 01/23/2021. (Admin.)
01/24/2021	62 (3 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 57 Order granting motion to appear pro hac vice adding Sarah B. Rogers for National Rifle Association of America (related document 33) Entered on 1/22/2021. (Bradden, T.) No. of Notices: 1. Notice Date 01/24/2021. (Admin.)
01/25/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (0.00). Receipt number KF - No Fee Due for filing by U.S. Federal Government Agency, amount \$ 0.00 (re: Doc 49). (Floyd)
01/25/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (0.00). Receipt number KF - No Fee Due for filing by U.S. Federal Government Agency, amount \$ 0.00 (re: Doc 56). (Floyd)
01/25/2021	63 (37 pgs; 3 docs) Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.).
01/25/2021	64 (9 pgs) Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 63 , (Arbaugh, Natalie)
01/25/2021	65 (10 pgs; 2 docs) Motion to file document under seal. <i>re: certain portions of and exhibits to 63 Motion to Modify Automatic Stay</i> Filed by Creditor Christopher Cox (Attachments: # 1 Proposed Order) (Arbaugh, Natalie)
01/25/2021	66 (4 pgs; 2 docs) Amended Motion to appear pro hac vice for Michael I. Baird. (related document: 49) Filed by Creditor Pension Benefit Guaranty Corporation (Attachments: # 1 Certificate of Service) (Baird, Michael)
01/25/2021	Receipt of filing fee for Motion for relief from stay(21-30085-hdh11) [motion,mrlfsty] (188.00). Receipt number 28440279, amount \$ 188.00 (re: Doc# 63). (U.S. Treasury)
01/25/2021	67 (4 pgs; 2 docs) Amended Motion to appear pro hac vice for Faheem A. Mahmooth. (related document: 56) Filed by Creditor Pension Benefit Guaranty Corporation (Attachments: # 1 Certificate of Service) (Mahmooth, Faheem)
01/25/2021	68 (4 pgs; 2 docs) Motion to appear pro hac vice for Lori A. Butler. Fee Amount \$100 Filed by Creditor Pension Benefit Guaranty Corporation (Attachments: # 1 Certificate of Service) (Butler, Lori)
01/26/2021	69 (5 pgs) Notice <i>Master Service List as of January 26, 2021</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
01/26/2021	70 (1 pg) Notice of Appearance and Request for Notice by Brandon R. Freud filed by Creditor Global New Beginnings, Inc.. (Freud, Brandon)
01/27/2021	71 (1 pg) Order granting motion to appear pro hac vice adding Michael I. Baird for Pension Benefit Guaranty Corporation (related document # 66) Entered on 1/27/2021. (Bradden, T.)

01/27/2021	72 (1 pg) Order granting motion to appear pro hac vice adding Faheem A. Mahmooth for Pension Benefit Guaranty Corporation (related document # 67) Entered on 1/27/2021. (Bradden, T.)
01/27/2021	73 (1 pg) Order granting motion to appear pro hac vice adding Lori A. Butler for Pension Benefit Guaranty Corporation (related document # 68) Entered on 1/27/2021. (Bradden, T.)
01/28/2021	74 (3 pgs) Order granting motion to seal certain portions of and exhibits to his motion (I)to modify the automatic stay to allow a trial-ready arbitration to proceed against the National Rifle Association of America, and (II) for related relief (related document # 65) Entered on 1/28/2021. (Bradden, T.)
01/28/2021	75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay <i>REDACTED</i> Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.).
01/28/2021	76 (9 pgs; 2 docs) Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick)
01/28/2021	77 (7 pgs; 2 docs) Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick)
01/28/2021	78 (17 pgs; 3 docs) Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
01/28/2021	79 (4 pgs; 2 docs) Motion for expedited hearing(related documents 76 Motion to pay pre-petition debt, 77 First Day Motion, 78 First Day Motion) <i>Motion for Expedited Consideration</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #76, #77, #78 SET FOR HEARING ON 2/10/21 AT 2:00 PM VIA WEBEX) Modified on 1/29/2021 (Bergreen, J.). Modified hearing time on 2/2/2021 (Bergreen, J.).
01/28/2021	80 (3 pgs) Meeting of creditors 341(a) meeting to be held on 2/22/2021 at 10:00 AM by TELEPHONE. Proofs of Claims due by 5/24/2021. Government Proof of Claim due by 8/23/2021. (Bradden, T.)
01/29/2021	81 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 2/10/2021 at 01:30 PM Dallas Judge Hale Ctrm for 77 and for 78 and for 76 , (Neligan, Patrick)
01/29/2021	82 (19 pgs; 4 docs) Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick)
01/29/2021	83 (6 pgs) Certificate of service re: Various Motions filed by Debtor National Rifle Association of America (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to</i>

	<i>Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> , 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> , 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> . (Neligan, Patrick)
01/29/2021	84 (53 pgs; 6 docs) Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A_Retention Application Proposed Order # 2 Exhibit B_Declaration of M. Collins # 3 Exhibit C_Declaration of Meadows # 4 Exhibit D_Declaration of Frazer # 5 Exhibit E_Disclosure) (Collins, Michael)
01/30/2021	85 (5 pgs) Certificate of service re: Debtors Application for Entry of an Order Pursuant to Sections 105(a), 327(e), 328(a), 329 and 1107(b) of the Bankruptcy Code, Authorizing and Approving the Employment and Retention filed by Debtor National Rifle Association of America (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i>). (Collins, Michael)
01/30/2021	86 (5 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 74 Order granting motion to seal certain portions of and exhibits to his motion (I)to modify the automatic stay to allow a trial-ready arbitration to proceed against the National Rifle Association of America, and (II) for related relief (related document 65) Entered on 1/28/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 01/30/2021. (Admin.)
02/01/2021	88 (1 pg) Notice of change of address filed by Creditor Under Wild Skies . (Rielly, Bill)
02/01/2021	89 (247 pgs) Creditor matrix amended to add additional creditor(s). Fee Amount \$32 <i>Debtors' Amended Creditor Matrix</i> . Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/01/2021	Receipt of filing fee for Matrix(21-30085-hdh11) [misc,matrix] (32.00). Receipt number 28459307, amount \$ 32.00 (re: Doc# 89). (U.S. Treasury)
02/01/2021	90 (32 pgs; 4 docs) Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick)
02/01/2021	91 (8 pgs; 2 docs) Motion for expedited hearing(related documents 90 Application to employ) <i>Motion for Expedited Consideration</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #90 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/2/2021 (Bergreen, J.).
02/02/2021	92 (3 pgs) Notice of Appearance and Request for Notice by Gerrit M. Pronske filed by Interested Party Attorney General of the State of New York. (Pronske, Gerrit)
02/02/2021	93 (3 pgs) Notice of Appearance and Request for Notice by Jason Patrick Kathman filed by Interested Party Attorney General of the State of New York. (Kathman, Jason)
02/02/2021	94 (3 pgs) Notice of Appearance and Request for Notice <i>by James Sheehan, Emily Stern and Monica Connell</i> by Gerrit M. Pronske filed by Interested Party Attorney General of the State of New York. (Pronske, Gerrit)
02/02/2021	95 (3 pgs) Notice of Appearance and Request for Notice by Eric M. Van Horn filed by Interested Party Attorney General of the State of New York. (Van Horn, Eric)

02/02/2021	96 (1 pg) Clerk's correspondence requesting Creditors uploaded from attorney for debtor. (RE: related document(s) 89 Creditor matrix amended to add additional creditor(s). Fee Amount \$32 <i>Debtors' Amended Creditor Matrix</i> . Filed by Debtor National Rifle Association of America.) Responses due by 2/3/2021. (Kerr, S.)
02/02/2021	97 (4 pgs) Notice of Master Service List filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/02/2021	98 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 82 , (Neligan, Patrick)
02/02/2021	99 (9 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 2/10/2021 at 02:00 PM Dallas Judge Hale Ctrm for 77 and for 78 and for 76 , (Neligan, Patrick)
02/02/2021	100 (8 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 90 , (Neligan, Patrick)
02/02/2021	101 (2 pgs) Notice of Appearance and Request for Notice by Mark H. Ralston filed by Creditor Quad/Graphics, Inc.. (Ralston, Mark)
02/03/2021	102 (3 pgs) Notice of Appearance and Request for Notice by Joe E. Marshall filed by Creditor The Bancorp Bank. (Marshall, Joe)
02/03/2021	103 (3 pgs) Notice of Appearance and Request for Notice by Donald Hogan Cram III filed by Interested Party Severson & Werson, A Professional Corporation. (Cram, Donald)
02/04/2021	104 (2 pgs) Motion to appear pro hac vice for Robert Lapowsky. Fee Amount \$100 Filed by Creditor The Bancorp Bank (Marshall, Joe)
02/04/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28468242, amount \$ 100.00 (re: Doc# 104). (U.S. Treasury)
02/04/2021	105 (3 pgs) U.S. Trustee's appointment of committee of <i>Unsecured Creditors</i> (Lambert, Lisa)
02/04/2021	106 (81 pgs; 2 docs) Motion for adequate protection Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order) (Ralston, Mark)
02/04/2021	107 (10 pgs; 2 docs) Motion for expedited hearing(related documents 106 Motion for adequate protection) Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order) (Ralston, Mark) (GRANTED ORALLY; DE #106 SET FOR HEARING ON 2/10/21 AT 2:00 PM VIA WEBEX) Modified on 2/4/2021 (Bergreen, J.).

02/04/2021	108 (8 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A_Retention Application Proposed Order # 2 Exhibit B_Declaration of M. Collins # 3 Exhibit C_Declaration of Meadows # 4 Exhibit D_Declaration of Frazer # 5 Exhibit E_Disclosure)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 84 , (Collins, Michael)
02/04/2021	109 (16 pgs; 2 docs) INCORRECT ENTRY. INCORRECT EVENT USED, SEE ENTRY 112 Motion to pay <i>Debtors' Motion to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Certain Professionals</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) Modified on 2/5/2021 (Kerr, S.).
02/04/2021	110 (8 pgs; 2 docs) Motion for expedited hearing(related documents 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #110 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/8/2021 (Bergreen, J.).
02/04/2021	111 (3 pgs) Notice of Appearance and Request for Notice by Marcus Jermaine Watson filed by Creditor Phillip Journey. (Watson, Marcus)
02/04/2021	112 (16 pgs) Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.) (Entered: 02/05/2021)
02/05/2021	113 (8 pgs) Notice of hearing filed by Creditor Quad/Graphics, Inc. (RE: related document(s) 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order)). Hearing to be held on 2/10/2021 at 02:00 PM Dallas Judge Hale Ctrm for 106 , (Ralston, Mark)
02/08/2021	114 (212 pgs; 4 docs) Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order) (Watson, Marcus)
02/08/2021	115 (21 pgs; 4 docs) Application to employ Colliers International as Broker <i>Application for Order Authorizing the Employment of Colliers International as the Debtors' Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Proposed Order) (Neligan, Patrick)
02/08/2021	116 (4 pgs; 2 docs) Motion for expedited hearing(related documents 115 Application to employ) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #115 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/9/2021 (Bergreen, J.).
02/08/2021	117 (4 pgs) Notice of Agenda of Matters Scheduled for Hearing on February 10, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance</i>

	<i>of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> filed by Debtor National Rifle Association of America, 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order)). (Neligan, Patrick). Modified on 2/9/2021 (Kerr, S.).
02/08/2021	118 (78 pgs) Witness and Exhibit List filed by Creditor Quad/Graphics, Inc. (RE: related document(s) 106 Motion for adequate protection). (Ralston, Mark)
02/08/2021	119 INCORRECT ENTRY: NO PDF ATTACHED. Notice of change of address filed by Creditor Communications Corp of America . (Tello, Chris) Modified on 2/8/2021 (Tello, Chris).
02/08/2021	120 (2 pgs) Notice of change of address filed by Creditor Communications Corp of America . (Tello, Chris)
02/08/2021	121 (34 pgs) Objection (REDACTED) to (related document(s): 63 Motion for relief from stay Fee amount \$188, filed by Creditor Christopher Cox) <i>Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick) Modified text to indicate "redacted" on 2/9/2021 (Bergreen, J.).
02/08/2021	122 (11 pgs; 2 docs) INCORRECT ENTRY: Incorrect event used. See entry 123 Motion for leave <i>Debtors' Motion for Leave to File Under Seal Certain Portions of and Exhibits to Debtors' Response to Christopher Cox Motion to Lift Stay</i> (related document(s) 63 Motion for relief from stay) Filed by Debtor National Rifle Association of America Objections due by 3/1/2021. (Attachments: # 1 Proposed Order) (Neligan, Patrick) Modified on 2/9/2021 (Kerr, S.).
02/08/2021	123 (11 pgs) Motion to file Under Seal Certain Portions of and Exhibits to Debtors' Response to Christopher Cox Motion to Lift Stay. Related document(s) 63 Motion for relief from stay Fee amount \$188, filed by Creditor Christopher Cox) Filed by Debtor National Rifle Association of America (Kerr, S.) . Modified on 2/9/2021 (Kerr, S.). (Entered: 02/09/2021)
02/09/2021	124 (1 pg) Order granting motion to appear pro hac vice adding Robert Lapowsky for The Bancorp Bank (related document # 104) Entered on 2/9/2021. (Bradden, T.)
02/09/2021	125 (5 pgs) Complex Service List <i>Master Service List as of February 9, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 53 Order granting complex chapter 11 treatment). (Neligan, Patrick)
02/09/2021	126 (3 pgs) Notice of Appearance and Request for Notice by Louis R. Strubeck Jr. filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
02/09/2021	127 (3 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing to be Held on February 10, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> , 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i> , 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for</i>

	<i>Approval of Certain Notice and Confidentiality Procedures, 106 Motion for adequate protection). (Neligan, Patrick)</i>
02/09/2021	128 (4 pgs) Amended Notice <i>Amended Agenda of Matters Scheduled for Hearing on February 10, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order)). (Neligan, Patrick)
02/09/2021	129 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix, 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 6 Motion to pay Debtors' <i>Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> , 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> , 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate</i> , 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> , 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> , 78 Motion to maintain bank accounts <i>Waiver of Requirements of Section 345(b). Debtors' Motion for Waiver of the Requirements of Section 345(b), 106 Motion for adequate protection). (Smith, Laura)</i>
02/10/2021	130 (5 pgs) Notice of hearing filed by Creditor Phillip Journey (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order)). Hearing to be held on 3/9/2021 at 01:30 PM Dallas Judge Hale Ctrm for 114 , (Watson, Marcus)
02/10/2021	131 (54 pgs) Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.)
02/10/2021	132 (45 pgs; 4 docs) Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick)
02/10/2021	133 (3 pgs; 2 docs) Motion for expedited hearing (related documents 132 Application to employ) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #132 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/11/2021 (Bergreen, J.).
02/10/2021	134 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 115 Application to employ Colliers International as Broker <i>Application for Order Authorizing</i>

	<i>the Employment of Colliers International as the Debtors' Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Proposed Order)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 115 , (Neligan, Patrick)
02/10/2021	135 (7 pgs) Certificate of service re: Application to Employ Garner Turner Gordon LLP filed by Debtor National Rifle Association of America (RE: related document(s) 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> , 133 Motion for expedited hearing(related documents 132 Application to employ)). (Neligan, Patrick)
02/10/2021	136 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 112 , (Neligan, Patrick)
02/10/2021	137 Hearing held on 2/10/2021. (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette)
02/10/2021	138 Hearing held on 2/10/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 24TH; SECOND INTERIM ORDER TO BE UPLOADED.) (Green, Shanette)
02/10/2021	139 Hearing held on 2/10/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 24TH.) (Green, Shanette)
02/10/2021	140 Hearing held on 2/10/2021. (RE: related document(s) 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America.) (FINAL ORDER TO BE UPLOADED.) (Green, Shanette)
02/10/2021	141 Hearing held on 2/10/2021. (RE: related document(s) 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America.) (FINAL ORDER TO BE UPLOADED.) (Green, Shanette)
02/10/2021	142 Hearing held on 2/10/2021. (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 2/24/21.) (Green, Shanette)
02/10/2021	143 Hearing held on 2/10/2021. (RE: related document(s) 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette)
02/10/2021	144 Hearing held on 2/10/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America.) (RESET TO 2/24/21.) (Green, Shanette)
02/10/2021	145 Hearing held on 2/10/2021. (RE: related document(s) 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc.) (ORDER AGREED AS TO FORM TO BE UPLOADED.) (Green,

	Shanette)
02/10/2021	<p>146 (2 pgs) Court admitted exhibits date of hearing 02/10/2021. QUAD/GRAPHICS, INC. EXHIBITS 1,2, AND 3 ADMITTED (FILED AT DKT #118.) (RE: related document(s)4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order), 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 7 Motion to pay tax debts <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc. (Attachments: # 1 Proposed Order) (Green, Shanette).</p>
02/11/2021	<p>147 (10 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s)5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 78 and for 6 and for 5 and for 76. (Neligan, Patrick)</p>
02/11/2021	<p>148 (10 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s)132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 132. (Neligan, Patrick)</p>
02/12/2021	<p>149 Request for transcript regarding a hearing held on 2/10/2021. The requested turn-around time is 7-day expedited (Green, Shanette)</p>
02/12/2021	<p>150 (9 pgs) Notice of hearing filed by Creditor Ackerman McQueen, Inc. (RE: related document(s)131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.)). Hearing to be held on 3/29/2021 at 10:30 AM Dallas Judge Hale Ctrm for 131. (Acosta, H)</p>
02/12/2021	<p>151 (3 pgs) Notice of Appearance and Request for Notice by Judith W. Ross filed by Creditor Member</p>

	Marketing Partners LLC. (Ross, Judith)
02/12/2021	152 (4 pgs) Motion to appear pro hac vice for Gregory E. Garman. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Neligan, Patrick)
02/12/2021	153 (7 pgs) Motion to appear pro hac vice for William M. Noall. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Neligan, Patrick)
02/12/2021	154 (6 pgs) Motion to appear pro hac vice for Teresa M. Pilatowicz. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Neligan, Patrick)
02/12/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28492500, amount \$ 100.00 (re: Doc# 152). (U.S. Treasury)
02/12/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28492500, amount \$ 100.00 (re: Doc# 153). (U.S. Treasury)
02/12/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28492500, amount \$ 100.00 (re: Doc# 154). (U.S. Treasury)
02/12/2021	155 (4 pgs) Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York (Pronske, Gerrit)
02/12/2021	156 (502 pgs; 2 docs) Brief in support filed by Interested Party Attorney General of the State of New York (RE: related document(s) 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i>). (Attachments: # 1 Appendix) (Pronske, Gerrit)
02/12/2021	157 (3 pgs) Notice of Appearance and Request for Notice <i>for Scott Drake and Nick Hendrix</i> by Laura Lynn Smith filed by Creditor Committee Official Committee of Unsecured Creditors. (Smith, Laura)
02/12/2021	163 (4 pgs) Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.) (Entered: 02/16/2021)
02/15/2021	158 (3 pgs) Joinder by <i>the Official Committee of Unsecured Creditors to the Debtors' Opposition to the Motion of Christopher W. Cox to Modify the Automatic Stay</i> filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 121 Objection). (Gluck, Kristian)
02/15/2021	159 (16 pgs) Schedules: Schedules A/B and D-H with Summary of Assets and Liabilities (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 9 Notice of deficiency). (Neligan, Patrick)
02/15/2021	160 (13 pgs) Statement of financial affairs for a non-individual . Filed by Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 9 Notice of deficiency). (Neligan, Patrick)
02/15/2021	161 (222 pgs) Schedules: Schedules A/B and D-H with Summary of Assets and Liabilities (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/15/2021	162 (54 pgs) Statement of financial affairs for a non-individual . Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/16/2021	164 (32 pgs; 5 docs) Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> Filed by Creditor Member Marketing Partners LLC Objections due by 3/9/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order) (Ross, Judith)

02/16/2021	165 (11 pgs; 2 docs) Motion for expedited hearing(related documents 164 Motion for leave) Filed by Creditor Member Marketing Partners LLC (Attachments: # 1 Proposed Order) (Ross, Judith) (GRANTED ORALLY; DE #164 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/17/2021 (Bergreen, J.).
02/16/2021	166 (35 pgs) Trustee's Objection to <i>Application to Employ Brewer, Attorneys and Counselors, as Special Counsel for the Estate</i> (RE: related document(s) 84 Application to employ) (Lambert, Lisa)
02/16/2021	167 (2 pgs) Order granting 4 Motion to extend time. Entered on 2/16/2021. (Ecker, C.)
02/16/2021	168 (5 pgs) Second Interim Order Authorizing Debtors' to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms Filed by Debtor National Rifle Association of America (related document # 5) Entered on 2/16/2021. (Okafor, M.)
02/16/2021	169 (2 pgs) Final Order Authorizing Debtors to Pay Certain Prepetition Taxes Filed by Debtor National Rifle Association of America (related document 7) Entered on 2/16/2021. (Okafor, M.)
02/16/2021	170 (4 pgs) Final Order (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance Filed by Debtor National Rifle Association of America (related document # 8) Entered on 2/16/2021. (Okafor, M.)
02/17/2021	171 (8 pgs) Notice of hearing filed by Creditor Member Marketing Partners LLC (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> Filed by Creditor Member Marketing Partners LLC Objections due by 3/9/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 164 , (Ross, Judith)
02/17/2021	172 (7 pgs) Joinder by filed by Creditor Christopher Cox (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> , 131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i>). (Arbaugh, Natalie)
02/17/2021	173 (298 pgs; 4 docs) Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Bennett, Ryan)
02/18/2021	174 (31 pgs) Transcript regarding Hearing Held 02/10/2021 (31 pages) RE: Motions. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 05/19/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 137 Hearing held on 2/10/2021. (RE: related document(s) 4 Motion to extend time to file schedules or new case deficiencies, excluding matrix Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.), 138 Hearing held on 2/10/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 24TH; SECOND INTERIM ORDER TO BE UPLOADED.), 139 Hearing held on 2/10/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 24TH.), 140 Hearing held on 2/10/2021. (RE: related document(s) 7 Motion to pay tax debts <i>Debtors'</i>

	<p><i>Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes</i> Filed by Debtor National Rifle Association of America.) (FINAL ORDER TO BE UPLOADED.), 141 Hearing held on 2/10/2021. (RE: related document(s) 8 Motion regarding utilities. <i>Debtors' Emergency Motion for Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance</i> Filed by Debtor National Rifle Association of America.) (FINAL ORDER TO BE UPLOADED.), 142 Hearing held on 2/10/2021. (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America.) (RESET TO THE 2/24/21.), 143 Hearing held on 2/10/2021. (RE: related document(s) 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.), 144 Hearing held on 2/10/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America.) (RESET TO 2/24/21.), 145 Hearing held on 2/10/2021. (RE: related document(s) 106 Motion for adequate protection Filed by Creditor Quad/Graphics, Inc.) (ORDER AGREED AS TO FORM TO BE UPLOADED.)). Transcript to be made available to the public on 05/19/2021. (Rehling, Kathy)</p>
02/18/2021	<p>175 (61 pgs) Amended Schedules: A/B, H, (with Declaration Under Penalty of Perjury for Non-Individual Debtors.). Filed by Debtor National Rifle Association of America. (Neligan, Patrick)</p>
02/18/2021	<p>176 (2 pgs) Affidavit for Proof of Publication filed by Debtor National Rifle Association of America (RE: related document(s) 80 Meeting of creditors Chapter 11). (Neligan, Patrick)</p>
02/18/2021	<p>177 (2 pgs) Order Granting Motion to file Under Seal Certain Portions of and Exhibits to Debtors' Response to Christopher Cox Motion to Lift Stay. Related document(s) 63 Motion for relief from stays (related document # 123) Entered on 2/18/2021. (Okafor, M.)</p>
02/18/2021	<p>178 (8 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 168 Second Interim Order Authorizing Debtors' to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms Filed by Debtor National Rifle Association of America (related document 5) Entered on 2/16/2021. (Okafor, M.)) No. of Notices: 12. Notice Date 02/18/2021. (Admin.)</p>
02/18/2021	<p>179 (5 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 170 Final Order (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Services on Account of Prepetition Invoices, (II) Approving Procedures for Providing Adequate Assurance of Postpetition Payments and (III) Approving Debtors' Proposed Form of Adequate Assurance Filed by Debtor National Rifle Association of America (related document 8) Entered on 2/16/2021. (Okafor, M.)) No. of Notices: 12. Notice Date 02/18/2021. (Admin.)</p>
02/18/2021	<p>180 (364 pgs; 10 docs) Witness and Exhibit List in Connection with Hearing on Application to Employ Brewer Attorneys & Counselors filed by U.S. Trustee United States Trustee (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney as Special Counsel for Debtors and Debtors in Possession). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit I # 9 Exhibit D) (Lambert, Lisa)</p>
02/19/2021	<p>181 (1 pg) Order granting motion to appear pro hac vice adding Gregory E. Garman for National Rifle Association of America (related document # 152) Entered on 2/19/2021. (Okafor, M.)</p>
02/19/2021	<p>182 (1 pg) Order granting motion to appear pro hac vice adding William M. Noall for National Rifle Association of America (related document # 153) Entered on 2/19/2021. (Okafor, M.)</p>
02/19/2021	<p>183 (1 pg) Order granting motion to appear pro hac vice adding Teresa M. Pilatowicz for National Rifle Association of America (related document # 154) Entered on 2/19/2021. (Okafor, M.)</p>

02/19/2021	184 (4 pgs) Chapter 11 or Chapter 9 Cases Non- Individual List of Creditors Who Have 20 Largest Unsecured Claims Against You and Are Not Insiders <i>Amended 20 Largest Unsecured Creditors</i> . Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/19/2021	185 (59 pgs; 6 docs) Witness and Exhibit List filed by Creditor Member Marketing Partners LLC (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i>). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Ross, Judith)
02/19/2021	186 (7 pgs) Certificate of service re: Witness & Exhibit List for Hearing Scheduled for February 24, 2021 at 2:00 P.M. filed by Creditor Member Marketing Partners LLC (RE: related document(s) 185 List (witness/exhibit/generic)). (Ross, Judith)
02/19/2021	187 (3 pgs) Notice of Appearance and Request for Notice by Scott P. Drake filed by Creditor Committee Official Committee of Unsecured Creditors. (Drake, Scott)
02/19/2021	188 (3 pgs) Notice of Appearance and Request for Notice by Nick J. Hendrix filed by Creditor Committee Official Committee of Unsecured Creditors. (Hendrix, Nick)
02/19/2021	189 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> , 78 Motion to maintain bank accounts <i>Waiver of Requirements of Section 345(b). Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> , 112 Motion to establish procedures <i>R INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR CERTAIN PROFESSIONALS.</i> , 115 Application to employ Colliers International as Broker Application for Order Authorizing the Employment of Colliers International as the Debtors' Real Estate Broker, 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i>). (Smith, Laura)
02/19/2021	190 (82 pgs; 2 docs) Notice of hearing filed by Interested Party Attorney General of the State of New York (RE: related document(s) 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.)). Hearing to be held on 3/29/2021 at 10:30 AM Dallas Judge Hale Ctrm for 163 and for 155 , (Attachments: # 1 Creditor Matrix) (Pronske, Gerrit)
02/19/2021	191 (72 pgs; 5 docs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing to be Held on February 24, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> , 78 Motion to maintain bank accounts <i>Waiver of Requirements of Section 345(b). Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 82 Application to employ Neligan LLP as Attorney Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor, 84 Application to employ Brewer Attorneys & Counselors as Attorney as Special Counsel for Debtors and Debtors in Possession, 115 Application to employ Colliers International as Broker Application for Order Authorizing the Employment of Colliers International as the Debtors' Real Estate Broker, 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i>). (Attachments: # 1 Exhibit 18 # 2 Exhibit 19 # 3 Exhibit 20 # 4 Exhibit 21) (Neligan, Patrick)

02/19/2021	192 (6 pgs) Agreed Order granting emergency joint motion for adequate protection agreement (related document # 106) Entered on 2/19/2021. (Okafor, M.)
02/19/2021	193 (3 pgs) Objection to (related document(s): 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> filed by Debtor National Rifle Association of America) and Joinder in the United States Trustee Objection to the Brewer Application Related document(s) 166 Objection filed by Creditor Ackerman McQueen, Inc.. (Gruber, G.). Modified on 2/22/2021 (Kerr, S.).
02/19/2021	198 (3 pgs) Joinder to US Trustee objection filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 193 Objection). (Kerr, S.) (Entered: 02/22/2021)
02/21/2021	194 (18 pgs) Trustee's Objection to MMPs Motion for an Order Requiring the United States Trustee to Reconstitute the Committee of Unsecured Creditors (RE: related document(s) 164 Motion for leave) (Lambert, Lisa)
02/21/2021	195 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 181 Order granting motion to appear pro hac vice adding Gregory E. Garman for National Rifle Association of America (related document 152) Entered on 2/19/2021. (Okafor, M.)) No. of Notices: 1. Notice Date 02/21/2021. (Admin.)
02/21/2021	196 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 182 Order granting motion to appear pro hac vice adding William M. Noall for National Rifle Association of America (related document 153) Entered on 2/19/2021. (Okafor, M.)) No. of Notices: 1. Notice Date 02/21/2021. (Admin.)
02/21/2021	197 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 183 Order granting motion to appear pro hac vice adding Teresa M. Pilatowicz for National Rifle Association of America (related document 154) Entered on 2/19/2021. (Okafor, M.)) No. of Notices: 1. Notice Date 02/21/2021. (Admin.)
02/22/2021	199 (7 pgs) Certificate of service re: Final Order Extending Time to File Schedules and Statements, Second Interim Order Authorizing Continue Use of Existing Cash Management System, Final Order Authorizing Debtors to Pay Prepetition Taxes filed by Debtor National Rifle Association of America (RE: related document(s) 167 Order on motion to extend/shorten time, 168 Order on first day motion, 169 Order on motion to pay tax debts). (Neligan, Patrick)
02/22/2021	200 (8 pgs) Certificate of service re: Final Order Prohibiting Utilities from Alter, Refusing or Discontinuing Service filed by Debtor National Rifle Association of America (RE: related document(s) 170 Order on first day motion). (Neligan, Patrick)
02/22/2021	201 (14 pgs) Debtor-in-possession monthly operating report for filing period 1/15/2021 to 1/31/2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/22/2021	202 (8 pgs) Debtor-in-possession monthly operating report for filing period 1/15/2021 to 1/31/2021 filed by Jointly Administered Party/Debtor Sea Girt, LLC. (Neligan, Patrick)
02/22/2021	203 (5 pgs) Response unopposed to (related document(s): 164 Motion for leave MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors filed by Creditor Member Marketing Partners LLC) filed by Creditor Pension Benefit Guaranty Corporation. (Baird, Michael)
02/22/2021	204 (3 pgs) INCORRECT ENTRY: Incorrect event used. See entry 211 Notice of Status Conference filed by Creditor Phillip Journey (RE: related document(s) 114 Motion to appoint trustee/ Motion for Appointment of Examiner Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order)). (Watson, Marcus) Modified on 2/23/2021 (Kerr, S.).

02/22/2021	205 (10 pgs) Notice of hearing <i>Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A_Retention Application Proposed Order # 2 Exhibit B_Declaration of M. Collins # 3 Exhibit C_Declaration of Meadows # 4 Exhibit D_Declaration of Frazer # 5 Exhibit E_Disclosure), 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 3/4/2021 at 01:30 PM Dallas Judge Hale Ctrm for 132 and for 82 and for 84 , (Neligan, Patrick)
02/22/2021	206 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 3/17/2021 at 02:00 PM Dallas Judge Hale Ctrm for 173 , (Bennett, Ryan)
02/22/2021	207 (8 pgs) Certificate of service re: Application to Employ Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Special Counsel filed by Debtor National Rifle Association of America (RE: related document(s) 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirk</i>). (Bennett, Ryan)
02/22/2021	208 (10 pgs; 2 docs) Motion to continue hearing on (related documents 114 Motion to appoint trustee) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order) (Kathman, Jason)
02/22/2021	209 (6 pgs; 2 docs) Motion for expedited hearing (related documents 208 Motion to continue) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order) (Kathman, Jason) (GRANTED ORALLY; DE #208 SET FOR HEARING ON 2/24/21 AT 2:00 PM VIA WEBEX) Modified on 2/23/2021 (Bergreen, J.).
02/22/2021	211 (3 pgs) Notice of hearing filed by Creditor Phillip Journey (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order)). Status Conference to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm. (Kerr, S.) (Entered: 02/23/2021)
02/22/2021	220 (3 pgs) Notice of Appearance and Request for Notice by creditor and interested party Rickey Schroeder, as Co-Trustee of The Legal Advocacy Committee for Arms Creditors with Integrity Trust, filed by Michael E Reznick . (Hyden, Kara) (Entered: 02/23/2021)
02/23/2021	210 (5 pgs) Notice of hearing filed by Interested Party Attorney General of the State of New York (RE: related document(s) 208 Motion to continue hearing on (related documents 114 Motion to appoint trustee) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order)). Hearing to be held on 2/24/2021 at 02:00 PM Dallas Judge Hale Ctrm for 208 , (Van Horn, Eric)
02/23/2021	212 (3 pgs) Motion to appear pro hac vice for Arthur A. Greenberg. Fee Amount \$100 Filed by Creditor Member Marketing Partners LLC (Ross, Judith)
02/23/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28509713, amount \$ 100.00 (re: Doc# 212). (U.S. Treasury)

02/23/2021	213 (3 pgs) Notice of Appearance and Request for Notice by Nancy Lynn Alper filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia. (Alper, Nancy)
02/23/2021	214 (32 pgs; 2 docs) Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1) (Alper, Nancy)
02/23/2021	215 (6 pgs) Notice <i>Master Service List as of 2/23/2021</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/23/2021	216 (3 pgs) Response unopposed to (related document(s): 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> filed by Creditor Member Marketing Partners LLC) filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/23/2021	217 (5 pgs) Notice of Agenda of Matters Scheduled for Hearing on February 24, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order), 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.), 115 Application to employ Colliers International as Broker <i>Application for Order Authorizing the Employment of Colliers International as the Debtors' Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Proposed Order), 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> Filed by Creditor Member Marketing Partners LLC Objections due by 3/9/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order), 208 Motion to continue hearing on (related documents 114 Motion to appoint trustee) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order)). (Neligan, Patrick)
02/23/2021	218 (7 pgs; 2 docs) Response opposed to (related document(s): 194 Objection) filed by Creditor Member Marketing Partners LLC. (Attachments: # 1 Exhibit A - Declaration of Murray Drechsler) (Ross, Judith)
02/23/2021	219 (7 pgs) Certificate of service re: Reply to U.S. Trustees Objection to MMPs Motion for an Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors filed by Creditor Member Marketing Partners LLC (RE: related document(s) 218 Response). (Ross, Judith)
02/23/2021	221 (8 pgs) Amended Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order);

	63 Motion for relief from stay <i>REDACTED</i> Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.). Hearing to be held on 4/14/2021 at 11:30 AM Dallas Judge Hale Ctrm for 75 and for 63 , (Arbaugh, Natalie)
02/23/2021	222 (6 pgs) Notice <i>Master Service List 2/23/2021</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/23/2021	223 (3 pgs) Declaration re: <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> filed by Creditor Member Marketing Partners LLC (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i>). (Ross, Judith)
02/23/2021	224 (6 pgs) Objection to (related document(s): 208 Motion to continue hearing on (related documents 114 Motion to appoint trustee) filed by Interested Party Attorney General of the State of New York) filed by Creditor Phillip Journey. (Watson, Marcus)
02/23/2021	225 (4 pgs) Motion to appear pro hac vice for Curtis L. Tuggle. Fee Amount \$100 Filed by Creditor InfoCision Management Corporation (Gordon, Sean)
02/23/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28511140, amount \$ 100.00 (re: Doc# 225). (U.S. Treasury)
02/23/2021	226 (50 pgs; 4 docs) Witness and Exhibit List <i>in Connection with Emergency Hearing on MMP's Motion for an Order Requiring the U.S. Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> filed by U.S. Trustee United States Trustee (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i>). (Attachments: # 1 Exhibit 1 - Amended List of 20 Largest # 2 Exhibit 2 - DellaQuilla Second Amended Complaint # 3 Exhibit 3 DellaQuilla Memorandum Opinion) (Lambert, Lisa)
02/24/2021	227 (2 pgs) Declaration re: <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> filed by Creditor Member Marketing Partners LLC (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i>). (Ross, Judith)
02/24/2021	228 SEALED document regarding: Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay per court order filed by Debtor National Rifle Association of America (RE: related document(s) 177 Order on motion to seal). (Attachments: # 1 Exhibit A) (Neligan, Patrick)
02/24/2021	229 (2 pgs) Notice of Appearance and Request for Notice by Stephen Wilcox filed by Creditor Ford Motor Credit Company LLC. (Wilcox, Stephen)
02/24/2021	230 (28 pgs; 9 docs) Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> Fee amount \$188, Filed by Creditor Ford Motor Credit Company LLC Objections due by 3/10/2021. (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442) (Wilcox, Stephen)
02/24/2021	231 (5 pgs) Motion for adequate protection Filed by Creditor Ford Motor Credit Company LLC (Wilcox, Stephen)

02/24/2021	232 (2 pgs) Notice of hearing filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 230 Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> Fee amount \$188, Filed by Creditor Ford Motor Credit Company LLC Objections due by 3/10/2021. (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442), 231 Motion for adequate protection Filed by Creditor Ford Motor Credit Company LLC). Preliminary hearing to be held on 3/25/2021 at 01:30 PM Dallas Judge Jernigan Ctrm. (Wilcox, Stephen)
02/24/2021	Receipt of filing fee for Motion for relief from stay(21-30085-hdh11) [motion,mrlfsty] (188.00). Receipt number 28514269, amount \$ 188.00 (re: Doc# 230). (U.S. Treasury)
02/24/2021	251 Hearing held on 2/24/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B)) (RESET TO 3/9/21.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	252 Hearing held on 2/24/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)) (RESET TO 3/4/21; ORDER AGREED W/ PBGC AND COMMITTEE.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	253 Hearing held on 2/24/2021. (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.) (RESET TO APRIL.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	254 Hearing held on 2/24/2021. (RE: related document(s) 76 Motion to pay pre-petition debt <i>Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order)) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	255 Hearing held on 2/24/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TO BE RESET TO 3/4/21.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	Hearing NOT held on 2/24/2021. (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America.) (AGREED RESET TO 3/4/21 PER J. GAITHER.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	Hearing NOT held on 2/24/2021. (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A _Retention Application Proposed Order # 2 Exhibit B _Declaration of M. Collins # 3 Exhibit C _Declaration of Meadows # 4 Exhibit D _Declaration of Frazer # 5 Exhibit E _Disclosure)) (AGREED RESET TO 3/4/21 PER J. GAITHER.) (Green, Shanette) (Entered: 03/01/2021)

02/24/2021	256 Hearing held on 2/24/2021. (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America.) (RESET TO 3/4/21.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	257 Hearing held on 2/24/2021. (RE: related document(s) 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.)) (RESET TO 3/4/21.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	259 Hearing held on 2/24/2021. (RE: related document(s) 115 Application to employ Colliers International as Broker <i>Application for Order Authorizing the Employment of Colliers International as the Debtors' Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Proposed Order)) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	Hearing NOT held on 2/24/2021. (RE: related document(s) 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America.) (AGREED RESET TO 3/4/21 PER J. GAITHER.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	260 Hearing held on 2/24/2021. (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> Filed by Creditor Member Marketing Partners LLC Objections due by 3/9/2021.) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION DENIED.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	261 Hearing held on 2/24/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey.) (STATUS CONFERENCE HELD.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	262 Hearing held on 2/24/2021. (RE: related document(s) 208 Motion to continue hearing on (related documents 114 Motion to appoint trustee) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order)) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED; MR. PRONSKE TO UPLOAD ORDER.) (Green, Shanette) (Entered: 03/01/2021)
02/24/2021	263 (1 pg) Court admitted exhibits date of hearing 02/24/2021. MOVANT EXHIBITS A-E ADMITTED FILED AT DKT #185. UST EXHIBITS 1-3 ADMITTED FILED AT DKT #226. (RE: related document(s) 164 Motion for leave <i>MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors</i> Filed by Creditor Member Marketing Partners LLC Objections due by 3/9/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order)) (Green, Shanette). (Entered: 03/01/2021)
02/25/2021	233 (1 pg) Order granting motion to appear pro hac vice adding Arthur A. Greenberg for Member Marketing Partners LLC (related document # 212) Entered on 2/25/2021. (Bradden, T.)
02/25/2021	234 (1 pg) Order granting motion to appear pro hac vice adding Curtis L. Tuggle for InfoCision Management Corporation (related document # 225) Entered on 2/25/2021. (Bradden, T.)
02/25/2021	235 (28 pgs; 9 docs) Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle

	Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442) (Wilcox, Stephen)
02/25/2021	236 (5 pgs) Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC (Wilcox, Stephen)
02/25/2021	237 (2 pgs) Amended Notice of hearing filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442), 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC). Preliminary hearing to be held on 3/17/2021 at 01:30 PM Dallas Judge Hale Ctrm. (Wilcox, Stephen)
02/25/2021	238 (40 pgs) Affidavit filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230), 236 Amended Motion for adequate protection (related document: 231)). (Wilcox, Stephen)
02/25/2021	239 (10 pgs) Notice of hearing <i>Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 3/9/2021 at 01:30 PM Dallas Judge Hale Ctrm for 78 and for 5 , (Neligan, Patrick)
02/25/2021	240 (10 pgs) Notice of hearing <i>Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.)). Hearing to be held on 3/4/2021 at 01:30 PM Dallas Judge Hale Ctrm for 112 and for 90 , (Neligan, Patrick)
02/25/2021	241 (10 pgs) INCORRECT ENTRY: INCORRECT EVENT CODE RE - Notice of hearing <i>Notice of Omnibus Hearing Dates</i> filed by Debtor National Rifle Association of America. Hearing to be held on 4/12/2021 at 01:30 PM Dallas Judge Hale Ctrm (Neligan, Patrick) Modified on 2/26/2021 (Bergreen, J.).
02/25/2021	Statement Adjourning 341(a) Meeting of Creditors. <i>See original 341 notice for call-in information.</i> 341(a) meeting to be held on 3/5/2021 at 01:00 PM by TELEPHONE. (Lambert, Lisa)
02/25/2021	242 (3 pgs) Notice of Appearance and Request for Notice <i>on Behalf of Catherine Jackson, Assistant Attorney General</i> by Nancy Lynn Alper filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia. (Alper, Nancy)

02/25/2021	243 (3 pgs) Notice of Appearance and Request for Notice <i>on Behalf of Leonor Miranda, Assistant Attorney General</i> by Nancy Lynn Alper filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia. (Alper, Nancy)
02/26/2021	244 (10 pgs) Notice of Omnibus Hearing Dates filed by Debtor National Rifle Association of America. (Neligan, Patrick)
02/26/2021	245 (4 pgs) Order granting motion to honor pre-petition obligations related to customer, donor and member programs (related document # 76) Entered on 2/26/2021. (Rielly, Bill)
02/26/2021	246 (7 pgs) Certificate of service re: The State of New York's Motion to Dismiss, or in the Alternative, to Appoint a Chapter 11 Trustee and Memorandum of Law in Support filed by Interested Party Attorney General of the State of New York (RE: related document(s) 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 156 Brief). (Van Horn, Eric)
02/27/2021	247 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 233 Order granting motion to appear pro hac vice adding Arthur A. Greenberg for Member Marketing Partners LLC (related document 212) Entered on 2/25/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 02/27/2021. (Admin.)
02/27/2021	248 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 234 Order granting motion to appear pro hac vice adding Curtis L. Tuggle for InfoCision Management Corporation (related document 225) Entered on 2/25/2021. (Bradden, T.)) No. of Notices: 2. Notice Date 02/27/2021. (Admin.)
02/28/2021	249 (7 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 245 Order granting motion to honor pre-petition obligations related to customer, donor and member programs (related document 76) Entered on 2/26/2021.) No. of Notices: 1. Notice Date 02/28/2021. (Admin.)
03/01/2021	250 (3 pgs) Notice of Appearance and Request for Notice by David William Parham filed by Creditor UKG Inc f/k/a The Ultimate Software Group Inc. (Parham, David)
03/01/2021	258 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> , 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> , 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i>). (Smith, Laura)
03/01/2021	264 (2 pgs) Notice of Appearance and Request for Notice by Robert Alan Blackwell filed by Creditor David Dell'Aquila. (Blackwell, Robert)
03/01/2021	265 (13 pgs; 3 docs) Motion to continue hearing on (related documents 84 Application to employ) <i>Debtors' Emergency Motion for Order Continuing Until April 2021 the Hearing on Debtors' Application for Order Authorizing and Approving Employment and Retention of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
03/01/2021	266 (89 pgs; 3 docs) Amended Witness and Exhibit List <i>in Connection with Hearing on Application to Employ Brewer Attorneys & Counselors</i> filed by U.S. Trustee United States Trustee (RE: related document(s) 180 List (witness/exhibit/generic)). (Attachments: # 1 Exhibit H - NRA 990 # 2 Exhibit K Transcript Lockton Hearing) (Lambert, Lisa)
03/01/2021	267 (6 pgs) Declaration re: <i>Amended Declaration of Patrick J. Neligan, Jr. in Support of Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors</i> filed by Debtor National Rifle Association of America (RE: related document(s) 82 Application to employ Neligan

	LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> . (Neligan, Patrick)
03/01/2021	268 (3 pgs) Objection to (related document(s): 166 Objection) <i>Debtor's Application for Entry of Order Pursuant to Sections 105(A), 327(E), 329 and 1107(B) of the Bankruptcy Code Authorizing and Approving the Employment and Retention Effective as of the Petition Date of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession and Joinder in the United States Trustee's Objection</i> filed by Creditor David Dell'Aquila. (Blackwell, Robert)
03/01/2021	269 (6 pgs) Response unopposed to (related document(s): 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> filed by Debtor National Rifle Association of America, 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> filed by Debtor National Rifle Association of America) filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
03/01/2021	270 (4 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing Scheduled for March 4, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> , 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> , 112 Motion to establish procedures R INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR CERTAIN PROFESSIONALS., 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i>). (Neligan, Patrick)
03/01/2021	271 (5 pgs; 2 docs) Motion for expedited hearing(related documents 265 Motion to continue) <i>Motion for Expedited Consideration</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) Modified to remove text "granted orally" on 3/2/2021 (Bergreen, J.).
03/01/2021	272 (10 pgs) Witness and Exhibit List filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i>). (Gruber, G.)
03/01/2021	273 (5 pgs) Witness and Exhibit List filed by Debtor National Rifle Association of America (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i>). (Collins, Michael)
03/02/2021	274 (4 pgs) Trustee's Objection to <i>Motion to Continue Application to Employ Brewer Firm as Special Counsel</i> (RE: related document(s) 265 Motion to continue) (Lambert, Lisa)
03/02/2021	275 (5 pgs; 2 docs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 265 Motion to continue hearing on (related documents 84 Application to employ) <i>Debtors' Emergency Motion for Order Continuing Until April 2021 the Hearing on Debtors' Application for Order Authorizing and Approving Employment and Retention of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 3/2/2021 at 03:00 PM Dallas Judge Hale Ctrm for 265 , (Attachments: # 1 Exhibit Webex Information) (Neligan, Patrick)
03/02/2021	276 (2 pgs) Order granting motion for expedited hearing (Related Doc# 271)(document set for hearing: 265 Motion to continue on 85 Application to employ) Hearing to be held on 3/2/2021 at 03:00 PM Dallas Judge Hale Ctrm for 265 , Entered on 3/2/2021. (Okafor, M.)
03/02/2021	277 (7 pgs) Final Order Authorizing Debtors' to Pay Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief (related document # 6) Entered on 3/2/2021. (Okafor, M.)

03/02/2021	278 (2 pgs) Order granting application to employ Colliers International as Broker (related document # 115) Entered on 3/2/2021. (Okafor, M.)
03/02/2021	279 (2 pgs) Order Denying MMP's Motion for An Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors Filed by Creditor Member Marketing Partners LLC (related document # 164) Entered on 3/2/2021. (Okafor, M.)
03/02/2021	284 Hearing held on 3/2/2021. (RE: related document(s) 265 Motion to continue hearing on (related documents 84 Application to employ) <i>Debtors' Emergency Motion for Order Continuing Until April 2021 the Hearing on Debtors' Application for Order Authorizing and Approving Employment and Retention of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED.) (Green, Shanette) (Entered: 03/04/2021)
03/03/2021	280 (1 pg) Clerk's correspondence requesting an order from attorney for debtor. (RE: related document(s) 77 Motion to establish procedures Notice and Confidentiality Procedures. <i>Debtors' Motion for Approval of Certain Notice and Confidentiality Procedures</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order)) Responses due by 3/17/2021. (Kerr, S.)
03/03/2021	281 (3 pgs) Notice of Agenda for Hearing Scheduled for March 4, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 82 Application to employ Neligan LLP as Attorney Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.), 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). (Neligan, Patrick)
03/03/2021	282 (134 pgs; 5 docs) Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Neligan, Patrick)
03/03/2021	283 (5 pgs; 2 docs) Motion for expedited hearing (related documents 282 Motion for adequate protection) <i>Motion for Expedited Consideration</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #282 SET FOR HEARING ON 3/17/21 AT 2:00 PM VIA WEBEX) Modified on 3/4/2021 (Bergreen, J.).
03/04/2021	285 (11 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)). Hearing to be held on 3/17/2021 at 02:00 PM Dallas Judge Hale Ctrm for 282 , (Neligan, Patrick)
03/04/2021	286 (236 pgs) Schedules: Schedules A/B and D-H with Summary of Assets and Liabilities (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/04/2021	287 (10 pgs) Schedules: E/F, with Summary of Assets and Liabilities (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Jointly Administered Party/Debtor Sea Girt, LLC. (Neligan, Patrick)

03/04/2021	288 (55 pgs) Statement of financial affairs for a non-individual <i>Amended Statement of Financial Affairs</i> . Filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/04/2021	289 Hearing held on 3/4/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)) (FINAL ORDER ENTERED 3/2/21.) (Green, Shanette)
03/04/2021	290 Hearing held on 3/4/2021. (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (APPROVED.) (Green, Shanette)
03/04/2021	291 Hearing held on 3/4/2021. (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A_Retention Application Proposed Order # 2 Exhibit B_Declaration of M. Collins # 3 Exhibit C_Declaration of Meadows # 4 Exhibit D_Declaration of Frazer # 5 Exhibit E_Disclosure)) (RESET UNTIL AFTER TRUSTEE HEARING HAS BEEN RULED ON.) (Green, Shanette)
03/04/2021	292 Hearing held on 3/4/2021. (RE: related document(s) 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.)) (GRANTED.) (Green, Shanette)
03/04/2021	293 Hearing held on 3/4/2021. (RE: related document(s) 132 Application to employ Garman Turner Gordon LLP as Attorney <i>Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (APPROVED.) (Green, Shanette)
03/04/2021	297 Hearing held on 3/4/2021. (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (GRANTED; K&L WILL FILE A SEPARATE APPLICATION.) (Green, Shanette) (Entered: 03/05/2021)
03/05/2021	294 (3 pgs) Order granting motion to continue hearing on (related document # 208) (related documents Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i>) Hearing to be held on 3/29/2021 at 10:30 AM Dallas Judge Hale Ctrm for 114 , Entered on 3/5/2021. (Bradden, T.)
03/05/2021	295 (2 pgs) Order approving certain notice and confidentiality procedures (related document # 77) Entered on 3/5/2021. (Bradden, T.)
03/05/2021	296 (4 pgs; 2 docs) Notice of Appearance and Request for Notice by Heather M. Crockett filed by Interested Party State of Indiana. (Attachments: # 1 Exhibit Government Attorney Certification) (Crockett, Heather)
03/05/2021	298 (3 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing to be Held on March 9, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 78 Motion to maintain bank accounts <i>Waiver of Requirements of Section 345(b). Debtors' Motion for Waiver of the Requirements of Section 345(b))</i> . (Neligan, Patrick)
03/05/2021	299 (12 pgs) Notice of hearing <i>Amended Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank</i>

	<i>Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 3/9/2021 at 01:30 PM Dallas Judge Hale Ctrm for 78 and for 5 , (Neligan, Patrick)
03/05/2021	300 (12 pgs) Amended Notice of Omnibus Hearing Dates filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/05/2021	301 (12 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)). Hearing to be held on 3/17/2021 at 02:00 PM via Webex: https://us-courts.webex.com/meet/hale for 282 , (Neligan, Patrick) Modified to add Webex link on 3/11/2021 (Bergreen, J.).
03/05/2021	302 (4 pgs) Motion to appear pro hac vice for Talitha Gray Kozlowski. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Neligan, Patrick)
03/05/2021	303 (4 pgs) Motion to appear pro hac vice for Dylan T. Ciciliano. Fee Amount \$100 Filed by Debtor National Rifle Association of America (Neligan, Patrick)
03/05/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28539031, amount \$ 100.00 (re: Doc# 302). (U.S. Treasury)
03/05/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28539031, amount \$ 100.00 (re: Doc# 303). (U.S. Treasury)
03/05/2021	304 (4 pgs; 2 docs) Notice of Appearance and Request for Notice by James F. Chiu filed by Interested Party State of Indiana. (Attachments: # 1 Exhibit Government Attorney Certification) (Chiu, James)
03/05/2021	305 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Exist</i> , 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i>). (Smith, Laura)
03/05/2021	306 (6 pgs) Objection to (related document(s): 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia) filed by Creditor Phillip Journey. (Watson, Marcus)
03/06/2021	307 (334 pgs; 3 docs) Omnibus Response opposed to (related document(s): 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Garman, Gregory)
03/07/2021	308 (4 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 295 Order approving certain notice and confidentiality procedures (related document 77) Entered on 3/5/2021. (Bradden, T.)) No. of Notices: 19. Notice Date 03/07/2021. (Admin.)

03/08/2021	309 (4 pgs) Notice of Agenda of Matters Scheduled for Hearing on March 9, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). (Neligan, Patrick)
03/08/2021	310 (1 pg) Notice of change of address filed by Creditor Racine County Line Rifle Club Inc. . (Rielly, Bill)
03/08/2021	311 (2 pgs) Declaration re: <i>Declaration of Jacqueline R. Scott on Behalf of Proposed Ordinary Course Professional Fortney & Scott, LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/08/2021	312 (2 pgs) Declaration re: <i>Declaration of Jeffrey H. Greger on Behalf of Proposed Ordinary Course Professional Hauptman Ham, LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/08/2021	313 (2 pgs) Declaration re: <i>Declaration of Jason Torchinsky on Behalf of Proposed Ordinary Course Professional Holtzman Vogel Josefiak Torchinsky PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/08/2021	314 (2 pgs) Declaration re: <i>Declaration of Donald P. Lan, Jr. on Behalf of Proposed Ordinary Course Professional Lan, Smith, Sosolik, Baxter-Thompson & Johnston, PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/08/2021	315 (2 pgs) INCORRECT ENTRY: Incomplete pdf attached. Declaration re: <i>Declaration of Raymond M. DiGuiseppe on Behalf of Proposed Ordinary Course Professional The DiGuiseppe Law Firm, P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick) Modified on 3/9/2021 (Kerr, S.).
03/08/2021	316 (2 pgs) Declaration re: <i>Declaration of George M. Lee on Behalf of Proposed Ordinary Course Professional Seiler Epstein LLP</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/08/2021	317 (2 pgs) Declaration re: <i>Declaration of William W. Davis on Behalf of Ordinary Course Professional William W. Davis, Esq.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/09/2021	318 (2 pgs) Declaration re: <i>Declaration of Raymond M. DiGuiseppe on Behalf of Proposed Ordinary</i>

	<i>Course Professional The DiGuiseppe Law Firm, P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/09/2021	319 (3 pgs) Order granting application to employ Neligan LLP as Counsel to the debtor (related document # 82) Entered on 3/9/2021. (Bradden, T.)
03/09/2021	320 (2 pgs) Declaration re: <i>Declaration of Michael Loukota on Behalf of Proposed Ordinary Course Professional Founds Series of Lockton Companies LLC f/k/a Kansas City Series of Lockton Companies, LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/09/2021	321 (12 pgs) Order authorizing employment and payment of professionals utilized in the ordinary course of business (RE: related document(s) 90 Application to employ filed by Debtor National Rifle Association of America). Entered on 3/9/2021 (Bradden, T.)
03/09/2021	322 (7 pgs) Order granting debtors' motion to establish procedures for interim compensation and reimbursement of expenses for case professionals (related document # 112) Entered on 3/9/2021. (Bradden, T.)
03/09/2021	323 (1 pg) Order granting motion to appear pro hac vice adding Talitha Beth Gray Kozlowski for National Rifle Association of America (related document # 302) Entered on 3/9/2021. (Bradden, T.)
03/09/2021	324 (1 pg) Order granting motion to appear pro hac vice adding Dylan Thomas Ciciliano for National Rifle Association of America (related document # 303) Entered on 3/9/2021. (Bradden, T.)
03/09/2021	325 (7 pgs) Notice <i>Master Service List as of March 9, 2021</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/09/2021	326 (2 pgs) Declaration re: <i>Declaration of Christopher M. Day on Behalf of Proposed Ordinary Course Professional Juris Day PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/09/2021	327 (2 pgs) Declaration re: <i>Amended Declaration of Raymond DiGuiseppe on Behalf of Proposed Ordinary Course Professional The DiGuiseppe Law Firm PC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/09/2021	328 Request for transcript regarding a hearing held on 3/2/2021. The requested turn-around time is daily (Green, Shanette)
03/09/2021	329 (2 pgs) Declaration re: <i>Declaration of Stephen Halbrook on Behalf of Proposed Ordinary Course Professional Stephen Halbrook, Attorney at Law</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/09/2021	330 Hearing held on 3/9/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit

	A/Proposed Order # 2 Exhibit B)) (AGREED FORM OF ORDER TO BE UPLOADED.) (Green, Shanette)
03/09/2021	331 Hearing held on 3/9/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (RESET TO MARCH 17, 2021.) (Green, Shanette)
03/09/2021	Hearing NOT held on 3/9/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order)) (DE #114 TO BE RESET TO 3/29 PER HEARING HELD 2/24.) (Green, Shanette)
03/09/2021	Statement Adjourning 341(a) Meeting of Creditors. <i>See original 341 notice for call-in information.</i> 341(a) meeting to be held on 3/12/2021 at 01:00 PM by TELEPHONE. (Lambert, Lisa)
03/10/2021	332 (43 pgs) Transcript regarding Hearing Held 03/02/2021 (43 pages) RE: Motion to Continue Hearing. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 06/8/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 284 Hearing held on 3/2/2021. (RE: related document(s) 265 Motion to continue hearing on (related documents 84 Application to employ) <i>Debtors' Emergency Motion for Order Continuing Until April 2021 the Hearing on Debtors' Application for Order Authorizing and Approving Employment and Retention of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED.)). Transcript to be made available to the public on 06/8/2021. (Rehling, Kathy)
03/10/2021	333 (3 pgs) Declaration re: <i>Declaration of Gregory W. Lyons on Behalf of Proposed Ordinary Course Professional O'Neil, Cannon, Hollman, Dejong & Laing S.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/10/2021	334 (46 pgs) Declaration re: <i>Declaration of Brenda L. Jayne on Behalf of Proposed Ordinary Course Professional Aronson LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/10/2021	335 (12 pgs) Notice of hearing <i>Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 3/17/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 78 , (Neligan, Patrick)
03/10/2021	336 (32 pgs; 3 docs) Application to employ Norton Rose Fulbright US LLP as Attorney Filed by Creditor Committee Official Committee of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B) (Smith, Laura)
03/10/2021	337 (55 pgs; 4 docs) Application to employ AlixPartners, LLP as Financial Advisor Filed by Creditor Committee Official Committee of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Smith, Laura)
03/10/2021	338 Request for transcript regarding a hearing held on 3/9/2021. The requested turn-around time is 7-day expedited (Green, Shanette).

03/10/2021	339 (7 pgs) Certificate of service re: Committee Retention Applications filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 336 Application to employ Norton Rose Fulbright US LLP as Attorney , 337 Application to employ AlixPartners, LLP as Financial Advisor). (Smith, Laura)
03/10/2021	340 (2 pgs) Declaration re: <i>Declaration of John Parker Sweeney on Behalf of Proposed Ordinary Course Professional Bradley Arant Boult Cummings LLP</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/11/2021	341 (10 pgs) Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> Filed by Debtor National Rifle Association of America (Neligan, Patrick)
03/11/2021	342 (37 pgs; 6 docs) Declaration re: <i>Declaration of Gabrielle A. Hamm in Support of Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> filed by Debtor National Rifle Association of America (RE: related document(s) 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i>). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Neligan, Patrick)
03/11/2021	343 (4 pgs; 2 docs) Motion for expedited hearing(related documents 341 Motion for protective order) <i>Motion for Emergency Hearing on Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick)
03/11/2021	344 (12 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 3/15/2021 at 11:00 AM at https://us-courts.webex.com/meet/hale for 341 , (Neligan, Patrick)
03/11/2021	345 (2 pgs) Order granting motion for expedited hearing (Related Doc# 343)(document set for hearing: 341 Motion for protective order) Hearing to be held on 3/15/2021 at 11:00 AM at https://us-courts.webex.com/meet/hale for 341 , Entered on 3/11/2021. (Bradden, T.)
03/11/2021	346 (9 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 322 Order granting debtors' motion to establish procedures for interim compensation and reimbursement of expenses for case professionals (related document 112) Entered on 3/9/2021. (Bradden, T.)) No. of Notices: 22. Notice Date 03/11/2021. (Admin.) (Entered: 03/12/2021)
03/12/2021	347 (12 pgs) Transcript regarding Hearing Held 03/09/2021 (12 pages) RE: Omnibus Hearing. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 06/10/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com , Telephone number 972-786-3063. (RE: related document(s) 330 Hearing held on 3/9/2021. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B)) (AGREED FORM OF ORDER TO BE UPLOADED.), 331 Hearing held on 3/9/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (RESET TO MARCH 17, 2021.)). Transcript to be made available to the public on 06/10/2021. (Rehling, Kathy)

03/12/2021	348 (4 pgs) Declaration re: <i>Declaration of William W. Davis in Support of Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take the Deposition of the Honorable Phillip Journey</i> filed by Debtor National Rifle Association of America (RE: related document(s) 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i>). (Neligan, Patrick)
03/12/2021	349 (26 pgs; 4 docs) Application to employ BVA Group as Financial Advisor <i>Application for Order Authorizing the Retention and Employment of BVA Group Restructuring and Advisory LLC as Financial Advisor to the Debtors</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order) (Neligan, Patrick)
03/12/2021	350 (11 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing Scheduled for March 17, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirk</i> , 235 Amended Motion for relief from stay or, in the alternative, request for adequate protection (related document: 230), 236 Amended Motion for adequate protection (related document: 231), 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i>). (Neligan, Patrick)
03/12/2021	351 (3 pgs) Support/supplemental document <i>Exhibit 8 to Debtors' Witness and Exhibit List for March 17, 2021 Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 350 List (witness/exhibit/generic)). (Neligan, Patrick)
03/12/2021	352 (3 pgs) Witness and Exhibit List <i>for Hearing Scheduled March 17, 2021</i> filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirk</i> , 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i>). (Smith, Laura)
03/12/2021	353 (16 pgs) Objection to (related document(s): 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> filed by Debtor National Rifle Association of America) filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
03/12/2021	354 (20 pgs) Objection to (related document(s): 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey) filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
03/12/2021	355 (2 pgs) Declaration re: <i>Declaration of Charles R. Spies on Behalf of Proposed Ordinary Course Professional Dickinson Wright PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/12/2021	356 (19 pgs) Certificate Certificate of No Objection filed by Debtor National Rifle Association of America (RE: related document(s) 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirk</i>). (Neligan, Patrick)
03/12/2021	357 (20 pgs; 2 docs) Response opposed to (related document(s): 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the</i>

	<i>Honorable Phillip Journey</i> filed by Debtor National Rifle Association of America) filed by Interested Party Attorney General of the State of New York. (Attachments: # 1 Exhibit A) (Pronske, Gerrit)
03/12/2021	358 (17 pgs) Response opposed to (related document(s): 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey) filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/15/2021	359 (2 pgs) Notice of Appearance and Request for Notice by Michael W. May filed by Creditor United States of America (IRS). (May, Michael)
03/15/2021	360 (3 pgs) Declaration re: <i>Declaration of Thomas P. Pellis on Behalf of Proposed Ordinary Course Professional Meyer, Darragh, Buckler, Benenek & Eck, PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/15/2021	361 (2 pgs) Declaration re: <i>Declaration of Matthew K. Felty on Behalf of Proposed Ordinary Course Professional Lytle Soule & Felty, P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/15/2021	362 (15 pgs) Order granting application to employ Kirkland & Ellis LLP as Special Litigation Counsel effective as of January 15, 2021 (related document # 173) Entered on 3/15/2021. (Bradden, T.)
03/15/2021	363 (3 pgs) Verified statement pursuant to Rule 2019 filed by Roscoe B. Marshall Jr., Phillip Journey. (Watson, Marcus)
03/15/2021	371 Hearing held on 3/15/2021. (RE: related document(s) 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> Filed by Debtor National Rifle Association of America) (AGREEMENT REACHED.) (Green, Shanette) (Entered: 03/17/2021)
03/16/2021	364 (3 pgs) Order granting motion to continue hearing on (related document # 265) (related documents Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i>) Entered on 3/16/2021. (Bradden, T.)
03/16/2021	Announcement of PASS TO ANOTHER PRELIMINARY HEARING regarding hearing scheduled for 3/17/2021. Hearing continued to 4/14/2021 at 11:30 per Stephen Wilcox, filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442)). (Wilcox, Stephen)
03/16/2021	Announcement of PASS TO ANOTHER PRELIMINARY HEARING regarding hearing scheduled for 3/17/2021. Hearing continued to 4/14/2021 at 11:30 per Stephen Wilcox, filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC). (Wilcox, Stephen)

03/16/2021	365 (2 pgs) Order granting application to employ Garman Turner Gordon LLP as chapter 11 co-counsel for the debtors (related document # 132) Entered on 3/16/2021. (Bradden, T.)
03/16/2021	366 (4 pgs; 2 docs) Amended Notice of hearing filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442), 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC). Preliminary hearing to be held on 4/14/2021 at 11:30 AM Dallas Judge Hale Ctrm. (Attachments: # 1 Mailing matrix) (Wilcox, Stephen)
03/16/2021	367 (4 pgs) Notice <i>Agenda of Matters Scheduled for Hearing on March 17, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442), 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC, 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)). (Neligan, Patrick)
03/16/2021	368 (26 pgs) Response opposed to (related document(s): 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia) filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
03/16/2021	369 (262 pgs; 3 docs) Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> Filed by Debtor National Rifle Association of America Objections due by 3/30/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
03/16/2021	370 (2 pgs) Declaration re: <i>Declaration of Eric A. Lindberg on Behalf of Proposed Ordinary Course Professional Corr Cronin LLP</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an</i>

	<i>Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/17/2021	372 (100 pgs; 11 docs) Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J) (Noall, William)
03/17/2021	373 (6 pgs; 2 docs) Motion for expedited hearing(related documents 372 Motion to compel re: discovery) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Proposed Order) (Noall, William) (GRANTED ORALLY; DE #372 SET FOR HEARING ON 3/19/21 AT 9:00 AM VIA WEBEX) Modified on 3/18/2021 (Bergreen, J.).
03/17/2021	374 (2 pgs) Declaration re: <i>Declaration of James A. Valente on Behalf of Proposed Ordinary Course Professional Costello, Valente & Gentry P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/17/2021	375 (252 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 369 Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> Filed by Debtor National Rifle Association of America Objections due by 3/30/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 4/12/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 369 . (Neligan, Patrick)
03/17/2021	Hearing NOT held on 3/17/2021. (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442) (AGREED RESET TO 4/14/21 AT 1:30 PM PER S. WILCOX.), 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC) (AGREED RESET TO 4/14/21 AT 1:30 PM PER S. WILCOX.)(Green, Shanette) (Entered: 03/29/2021)
03/17/2021	427 Hearing held on 3/17/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (RESET TO 4/12/21.) (Green, Shanette) (Entered: 03/29/2021)
03/17/2021	Hearing NOT held on 3/17/2021. (RE: related document(s) 173 Application to employ Kirkland & Ellis LLP and Kirkland & Ellis LLP International as Special Counsel / <i>Debtors' Application for Entry of an Order Pursuant to Section 327(E) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (CERT. OF NO OBJ FILED; ORDER UPLOADED.) (Green, Shanette) (Entered: 03/29/2021)
03/17/2021	428 Hearing held on 3/17/2021. (RE: related document(s) 282 Motion for adequate protection <i>Debtors' Motion for Approval of Adequate Protection Payments to Atlantic Union Bank</i> Filed by Debtor National Rifle Association of America.) (A/O TO BE UPLOADED.) (Green, Shanette) (Entered: 03/29/2021)

03/18/2021	376 (11 pgs) Notice of Second Amendment to National Rifle Association of America's Statement of Financial Affairs filed by Debtor National Rifle Association of America (RE: related document(s) 288 Statement of financial affairs for a non-individual Amended Statement of Financial Affairs. Filed by Debtor National Rifle Association of America.). (Neligan, Patrick)
03/18/2021	377 (6 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 372 Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J)). Hearing to be held on 3/19/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 372 , (Noall, William)
03/18/2021	378 (27 pgs; 4 docs) Application to employ CBRE, Inc. as Broker Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick)
03/18/2021	379 (9 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 378 Application to employ CBRE, Inc. as Broker Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 4/12/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 378 , (Neligan, Patrick)
03/18/2021	380 (2 pgs) Declaration re: Declaration of Christian D. Ambler on Behalf of Proposed Ordinary Course Professional Stone & Johnson, Chtd. filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
03/18/2021	381 (41 pgs; 2 docs) Response opposed to (related document(s): 372 Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) filed by Interested Party Attorney General of the State of New York. (Attachments: # 1 Exhibit Declaration of J. Sheehan) (Pronske, Gerrit)
03/18/2021	382 (41 pgs; 2 docs) Motion for protective order and to Stay Rule 30(b)(6) Deposition Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Exhibit Declaration of J. Sheehan) (Pronske, Gerrit)
03/18/2021	383 (5 pgs; 2 docs) Motion for expedited hearing(related documents 382 Motion for protective order) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order) (Kathman, Jason) (GRANTED ORALLY; DE #382 SET FOR HEARING ON 3/19/21 AT 9:00 AM VIA WEBEX) Modified on 3/19/2021 (Bergreen, J.).
03/18/2021	384 (6 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 365 Order granting application to employ Garman Turner Gordon LLP as chapter 11 co-counsel for the debtors (related document 132) Entered on 3/16/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 03/18/2021. (Admin.)
03/19/2021	385 (3 pgs) Order granting motion for adequate protection payments to Atlantic Union Bank (related document # 282) Entered on 3/19/2021. (Bradden, T.)
03/19/2021	386 (15 pgs) Protective Order. Entered on 3/19/2021 (Bradden, T.)
03/19/2021	387 (6 pgs) Notice of hearing filed by Interested Party Attorney General of the State of New York (RE: related document(s) 386 Protective Order. Entered on 3/19/2021 (Bradden, T.)). Hearing to be held on 3/19/2021 at 09:00 AM Dallas Judge Hale Ctrm for 386 , (Van Horn, Eric)

03/19/2021	388 (2 pgs) Declaration re: <i>(Supplemental Declaration of David MacGreevey of AlixPartners, LLP)</i> filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 337 Application to employ AlixPartners, LLP as Financial Advisor). (Smith, Laura)
03/19/2021	389 (7 pgs) Certificate of service re: Supplemental Declaration of David MacGreevey of AlixPartners LLP filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 388 Declaration). (Smith, Laura)
03/19/2021	390 (12 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 378 Application to employ CBRE, Inc. as Broker <i>Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). Hearing to be held on 4/12/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 378 . (Neligan, Patrick)
03/19/2021	430 Hearing held on 3/19/2021. (RE: related document(s) 372 Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC.) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED IN PART.) (Green, Shanette) (Entered: 03/29/2021)
03/19/2021	431 Hearing held on 3/19/2021. (RE: related document(s) 382 Motion for protective order <i>and to Stay Rule 30(b)(6) Deposition</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Exhibit Declaration of J. Sheehan)) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED IN PART.) (Green, Shanette) (Entered: 03/29/2021)
03/22/2021	391 (105 pgs; 6 docs) Motion to compel re: discovery Debtors' Emergency Motion to Compel Ackerman McQueen, Inc. to Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Hamm, Gabrielle)
03/22/2021	392 (3 pgs) Motion for expedited hearing(related documents 391 Motion to compel re: discovery) <i>Motion for Emergency Hearing on Debtors' Emergency Motion to Compel Ackerman McQueen to Produce a Representative Under Fed. R. Civ. P. 30(b)(6)</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Hamm, Gabrielle) (GRANTED ORALLY; DE #391 SET FOR HEARING ON 3/24/21 AT 2:00 PM VIA WEBEX) Modified on 3/22/2021 (Bergreen, J.).
03/22/2021	393 (24 pgs; 3 docs) Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B) (Hamm, Gabrielle)
03/22/2021	394 (3 pgs) Motion for expedited hearing(related documents 393 Motion for protective order) <i>Motion for Emergency Hearing on Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Hamm, Gabrielle) (GRANTED ORALLY; DE #393 SET FOR HEARING ON 3/24/21 AT 2:00 PM VIA WEBEX) Modified on 3/22/2021 (Bergreen, J.).
03/22/2021	395 (12 pgs) Notice <i>Notice of Amended Second Amendment to National Rifle Association of America's Statement of Financial Affairs</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/22/2021	396 (14 pgs) Debtor-in-possession monthly operating report for filing period February 1, 2021 to February 28, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/22/2021	397 (9 pgs) Debtor-in-possession monthly operating report for filing period February 1, 2021 to February 28, 2021 filed by Jointly Administered Party/Debtor Sea Girt, LLC. (Neligan, Patrick)

03/22/2021	398 (7 pgs) Notice of hearing filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 391 Motion to compel re: discovery Debtors' Emergency Motion to Compel Ackerman McQueen, Inc. to Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E), 393 Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 3/24/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 393 and for 391 , (Noall, William)
03/22/2021	399 (14 pgs) Amended Debtor-in-possession monthly operating report for filing period February 1, 2021 to February 28, 2021 filed by Debtor National Rifle Association of America (RE: related document(s) 396 Operating report). (Neligan, Patrick)
03/23/2021	400 (2 pgs) Declaration re: <i>Amended Declaration of James A. Valente on Behalf of Proposed Ordinary Course Professional Costello, Valente & Gentry P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/23/2021	401 (2 pgs) Declaration re: <i>Declaration of Nathan Thomas on Behalf of Proposed Ordinary Course Professional Copilevitz, Lam & Raney, PC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
03/23/2021	402 (7 pgs) Notice of Master Service List as of March 23, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
03/23/2021	403 (19 pgs; 2 docs) Response opposed to (related document(s): 393 Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) filed by Interested Party Attorney General of the State of New York. (Attachments: # 1 Exhibit Declaration) (Van Horn, Eric)
03/24/2021	404 (8 pgs) Response opposed to (related document(s): 391 Motion to compel re: discovery Debtors' Emergency Motion to Compel Ackerman McQueen, Inc. to Produce a Representative Under Fed. R. Civ. P. 30(b)(6) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) filed by Creditor Ackerman McQueen, Inc.. (Mason, Brian)
03/24/2021	405 (12 pgs) US Trustee's comment(s) regarding <i>Statement Regarding Motions Seeking Appointment of Examiner, Trustee, or Case Dismissal</i> (Lambert, Lisa)
03/24/2021	406 (283 pgs) Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc. (Acosta, H)
03/24/2021	407 (3 pgs) Verified statement pursuant to Rule 2019 filed by Creditor Phillip Journey. (Watson, Marcus)
03/24/2021	408 (10 pgs) Motion for expedited hearing(related documents 406 Motion to compel re: discovery) Filed by Creditor Ackerman McQueen, Inc. (Acosta, H) (GRANTED ORALLY; DE #406 SET FOR HEARING ON 3/29/21 AT 1:30 PM VIA WEBEX) Modified on 3/25/2021 (Bergreen, J.).
03/24/2021	409 (11 pgs) Notice of hearing filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.). Hearing to be held on 3/26/2021 at 08:30 AM Dallas Judge Hale Ctrm for 406 , (Acosta, H)

03/24/2021	410 (11 pgs) Support/supplemental document <i>Proposed Order</i> filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 406 Motion to compel re: discovery Discovery). (Acosta, H)
03/24/2021	432 Hearing held on 3/24/2021. (RE: related document(s) 391 Motion to compel re: discovery Debtors' Emergency Motion to Compel Ackerman McQueen, Inc. to Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E)) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED IN PART.) (Green, Shanette) (Entered: 03/29/2021)
03/24/2021	433 Hearing held on 3/24/2021. (RE: related document(s) 393 Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B)) (FINDINGS OF FACT CONCLUSIONS OF LAW; DENIED.) (Green, Shanette) (Entered: 03/29/2021)
03/25/2021	411 (8 pgs) Notice of hearing <i>Notice of Status Conference Regarding Hearing Set to Commence on March 29, 2021 on Motion for Appointment of Examiner (Dkt #114) and Motions to Dismiss or Appoint Trustee (Dkts #131, 155 & 163, 214)</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)). Status Conference to be held on 3/25/2021 at 11:00 AM at https://us-courts.webex.com/meet/hale . (Hamm, Gabrielle)
03/25/2021	412 (7 pgs) Notice of <i>Limited Objection to the Debtors' Retention of Aronson LLC as an Ordinary Course Professional</i> filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 321 Order authorizing employment and payment of professionals utilized in the ordinary course of business (RE: related document(s) 90 Application to employ filed by Debtor National Rifle Association of America). Entered on 3/9/2021 (Bradden, T.), 334 Declaration re: <i>Declaration of Brenda L. Jayne on Behalf of Proposed Ordinary Course Professional Aronson LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>)). (Gluck, Kristian)
03/25/2021	413 (5 pgs) Amended Notice of hearing filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.). Hearing to be held on 3/29/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 406 , (Acosta, H)
03/25/2021	414 (3 pgs) Response unopposed to (related document(s): 406 Motion to compel re: discovery Discovery filed by Creditor Ackerman McQueen, Inc.) filed by Creditor Phillip Journey, Roscoe B. Marshall, Jr, Esther Schneider and Owen "Buz" Mills. (Taylor, Clay) Modified on 3/26/2021 (Kerr, S.).
03/25/2021	425 Hearing held on 3/25/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)) (ALL MATTERS CONTINUED TO 4/5/2021.) (Green, Shanette) (Entered: 03/29/2021)
03/25/2021	434 Hearing held on 3/25/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for</i>


	<i>Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)) (MATTERS CONTINUED TO 4/5/21.) (Green, Shanette) (Entered: 03/29/2021)
03/26/2021	415 (7 pgs) Joinder by <i>David Dell'Aquila</i> filed by Creditor David Dell'Aquila (RE: related document(s) 131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 214 Motion to appoint trustee, 368 Response). (Blackwell, Robert)
03/26/2021	416 (17 pgs; 2 docs) Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order) (Watson, Marcus)
03/26/2021	417 (166 pgs; 3 docs) Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Declaration of M. Connell in Support of Motion # 2 Proposed Order) (Pronske, Gerrit)
03/26/2021	418 (7 pgs; 2 docs) Motion for expedited hearing(related documents 417 Motion for leave) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order) (Van Horn, Eric) (GRANTED ORALLY; DE #417 SET FOR HEARING ON 3/31/21 AT 2:00 PM VIA WEBEX) Modified on 3/29/2021 (Bergreen, J.).
03/26/2021	419 (6 pgs; 2 docs) Notice of hearing filed by Interested Party Attorney General of the State of New York (RE: related document(s) 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Declaration of M. Connell in Support of Motion # 2 Proposed Order)). Hearing to be held on 3/31/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 417 , (Attachments: # 1 WebEx Hearing Instructions) (Pronske, Gerrit)
03/26/2021	420 (5 pgs) Amended Notice of hearing filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.). Hearing to be held on 3/31/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 406 , (Acosta, H)
03/26/2021	421 (3 pgs) Notice of hearing <i>Motion to Appoint Trustee</i> filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)). Hearing to be held on 3/29/2021 at 09:00 AM Dallas Judge Hale Ctrm for 214 , (Alper, Nancy)
03/26/2021	422 (3 pgs) Witness and Exhibit List filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 214 Motion to appoint trustee). (Alper, Nancy)
03/26/2021	423 (3 pgs) Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.).
03/26/2021	Hearing NOT held on 3/26/2021. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.) (TO BE RESET TO 3/29/21 PER THE COURT.) (Green, Shanette) (Entered: 03/29/2021)




03/26/2021	429 (3 pgs) Joinder in support of the motion to dismiss by filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 214 Motion to appoint trustee). (Kerr, S.) (Entered: 03/29/2021)
03/29/2021	424 (2 pgs) Order continuing hearing (RE: related document(s) 114 Motion to appoint trustee filed by Creditor Phillip Journey, 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/5/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 214 and for 131 and for 155 , Entered on 3/29/2021 (Bergreen, J.)
03/29/2021	Hearing NOT held on 3/29/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)) (ALL MATTERS RESET TO 4/5/21 AT 10:30 AM.) (Green, Shanette)
03/29/2021	Hearing NOT held on 3/29/2021. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.) (AGREED RESET TO 3/31/21 PER J. ACOSTA.) (Green, Shanette)
03/29/2021	426 (3 pgs) AMENDED Order continuing hearing (RE: related document(s) 114 Motion to appoint trustee filed by Creditor Phillip Journey, 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/5/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 214 and for 131 and for 155 , Entered on 3/29/2021 (Bradden, T.)
03/29/2021	435 (5 pgs) Notice of hearing filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order)). Hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 416 , (Watson, Marcus)
03/29/2021	436 (3 pgs) Notice of hearing filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)). Hearing to be held on 4/5/2021 at 10:30 AM Dallas Judge Hale Ctrm for 214 , (Alper, Nancy)
03/30/2021	437 (1 pg) Clerk's correspondence requesting an order from attorney for debtor. (RE: related document(s) 5 Motion to maintain bank accounts. <i>Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Proposed Order # 2 Exhibit B)) Responses due by 4/13/2021. (Kerr, S.)
03/30/2021	438 (6 pgs) Amended Notice of hearing filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall

	Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order)). Hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 416 , (Watson, Marcus)
03/30/2021	439 (5 pgs) Motion for leave to <i>File Brief of Arkansas and 15 Other States as Amici Curiae in Support of Debtors, and in Opposition to Motions to Dismiss</i> (related document(s) 131 Motion to dismiss case, 155 Motion to dismiss case, 214 Motion to appoint trustee) Filed by Interested Party State of Arkansas (Wagner, Vincent)
03/30/2021	440 (5 pgs; 2 docs) Declaration re: <i>of John C. Frazer in Support of Debtors' Petitions</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 1 Voluntary petition (chapter 11)). (Attachments: # 1 Exhibit 1) (Garman, Gregory)
03/30/2021	441 (115 pgs; 12 docs) Response opposed to (related document(s): 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> filed by Interested Party Attorney General of the State of New York) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K) (Hamm, Gabrielle)
03/31/2021	442 (32 pgs) Response opposed to (related document(s): 406 Motion to compel re: discovery Discovery filed by Creditor Ackerman McQueen, Inc.) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Noall, William)
03/31/2021	443 (2 pgs) Order granting in part, Debtors' emergency motion to compel Akerman McQueen to produce a representative under FED. R. CIV. P. 30(b)(6)(related document # 391) Entered on 3/31/2021. (Whitaker, Sheniqua)
03/31/2021	444 (2 pgs) Order granting motion for leave to file brief as Amici Curiae in support of Debtors; and in opposition to the State of New York's motion to dismiss, or in the alternative to appoint a chapter 11 trustee (related document # 439) Entered on 3/31/2021. (Bradden, T.)
03/31/2021	445 (17 pgs) Brief in opposition filed by Interested Party State of Arkansas (RE: related document(s) 131 Motion to dismiss case, 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee, 214 Motion to appoint trustee). (Wagner, Vincent)
03/31/2021	446 (3 pgs) Witness and Exhibit List filed by U.S. Trustee United States Trustee (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> , 131 Motion to dismiss case, 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee, 163 Motion to appoint trustee, 214 Motion to appoint trustee, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i>). (Lambert, Lisa)
03/31/2021	447 (300 pgs; 5 docs) Application to employ Briglia Hundley, P.C. as Attorney <i>Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Neligan, Patrick)
03/31/2021	448 (6 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 424 Order continuing hearing (RE: related document(s) 114 Motion to appoint trustee filed by Creditor Phillip Journey, 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/5/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 214 and for 131 and for 155 , Entered on 3/29/2021 (Bergreen, J.)) No. of Notices: 28. Notice Date 03/31/2021. (Admin.)




03/31/2021	498 Hearing held on 3/31/2021 (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc. (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION DENIED WITHOUT PREJUDICE); 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION DENIED WITHOUT PREJUDICE) (Bergreen, J.) (Entered: 04/06/2021)
04/01/2021	449 (11 pgs; 2 docs) Motion for expedited hearing(related documents 447 Application to employ) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY: DE #447 SET FOR HEARING ON 4/21/21 AT 2:00 PM VIA WEBEX) Modified on 4/1/2021 (Bergreen, J.).
04/01/2021	450 (6 pgs; 2 docs) Notice of hearing -- <i>Notice of Status Conference Regarding Hearing Scheduled to Begin on April 5, 2021</i> filed by Interested Party Attorney General of the State of New York. Hearing to be held on 4/2/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale (Attachments: # 1 WebEx Hearing Instructions) (Pronske, Gerrit)
04/01/2021	451 (12 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 447 Application to employ Briglia Hundley, P.C. as Attorney <i>Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)). Hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 447 , (Neligan, Patrick)
04/01/2021	452 (82 pgs; 8 docs) Witness and Exhibit List filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230), 236 Amended Motion for adequate protection (related document: 231)). (Attachments: # 1 Affidavit # 2 Commercial Lease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commercial Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 5 Supplement to Commercial Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 6 Certificate of Titles # 7 Payment history(s)) (Wilcox, Stephen)
04/01/2021	453 (3 pgs) Notice of Appearance and Request for Notice <i>on Behalf of Jennifer Jones, Special Trial Counsel, Office of Attorney General for the District of Columbia</i> by Nancy Lynn Alper filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia. (Alper, Nancy)
04/01/2021	454 (6 pgs; 2 docs) Amended Notice of hearing <i>Motion In Support of State of New York's Motion to Appoint Trustee</i> filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1)). Hearing to be held on 4/5/2021 at 10:30 AM Dallas Judge Hale Ctrm for 214 , (Attachments: # 1 Supplement WebEx Instructions) (Alper, Nancy)
04/01/2021	455 (6 pgs; 2 docs) Notice of hearing <i>on Motion In Support of State of New York's Motion to Dismiss</i> filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (RE: related document(s) 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)). Hearing to be held on 4/5/2021 at 10:30 AM Dallas Judge Hale Ctrm for 423 , (Attachments: # 1 Exhibit No. 1) (Alper, Nancy)
04/02/2021	456 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> ,


	131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 163 Motion to appoint trustee, 214 Motion to appoint trustee, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> . (Smith, Laura)
04/02/2021	457 (3 pgs) Verified statement pursuant to Rule 2019 filed by Bart Skelton, Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider. (Watson, Marcus)
04/02/2021	458 Request for transcript regarding a hearing held on 3/19/2021. The requested turn-around time is 7-day expedited (Bergreen, J.)
04/02/2021	459 (29 pgs) Omnibus Reply to (related document(s): 307 Response filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC, 368 Response filed by Creditor Committee Official Committee of Unsecured Creditors) filed by Interested Party Attorney General of the State of New York. (Kathman, Jason)
04/02/2021	460 (15 pgs) Witness and Exhibit List <i>for Hearing on Ackerman McQueen's Motion to Dismiss the Chapter 11 Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee</i> filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 131 Motion to dismiss case). (Gruber, G.)
04/02/2021	461 (5 pgs) Witness and Exhibit List filed by Creditor Phillip Journey (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> , 131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 163 Motion to appoint trustee, 214 Motion to appoint trustee, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i>). (Watson, Marcus)
04/02/2021	462 (31 pgs) Witness and Exhibit List <i>for Hearing to be Held Commencing April 5, 2021</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> , 131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 214 Motion to appoint trustee). (Garman, Gregory)
04/02/2021	463 (24 pgs) Witness and Exhibit List filed by Interested Party Attorney General of the State of New York (RE: related document(s) 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 163 Motion to appoint trustee). (Van Horn, Eric)
04/02/2021	464 (15 pgs) Amended Witness and Exhibit List filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 460 List (witness/exhibit/generic)). (Acosta, H)
04/02/2021	465 (16 pgs) Brief in opposition filed by Interested Party State of Texas (RE: related document(s) 131 Motion to dismiss case , 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> , 214 Motion to appoint trustee). (Lloyd, James)
04/02/2021	466 (2 pgs) Notice of Appearance and Request for Notice <i>Christina Carroll</i> by Brian Edward Mason filed by Creditor Ackerman McQueen, Inc.. (Mason, Brian)
04/02/2021	467 (36 pgs) Omnibus Reply to (related document(s): 306 Objection filed by Creditor Phillip Journey, 307 Response filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC, 368 Response filed by Creditor Committee Official Committee of Unsecured Creditors) filed by Creditor Ackerman McQueen, Inc.. (Acosta, H)
04/02/2021	586 Hearing held on 4/2/2021. (RE: related document(s) 1 Non-individual Chapter 11 Voluntary Petition. Fee Amount \$1738 Filed by National Rifle Association of America Chapter 11 Plan due by 05/17/2021. Disclosure Statement due by 05/17/2021.) (STATUS CONFERENCE HELD; COURT GAVE PARTIES GUIDANCE ON TRIAL PROCEDURES.) (Green, Shanette) (Entered: 04/15/2021)
04/03/2021	468 (1205 pgs; 8 docs) Support/supplemental document <i>Appendix</i> filed by Creditor Ackerman McQueen,

	Inc. (RE: related document(s) 467 Reply). (Attachments: # 1 Appendix Part 2 # 2 Appendix Part 3 # 3 Appendix Part 4 # 4 Appendix Part 5 # 5 Appendix Part 6 # 6 Appendix Part 7 # 7 Appendix Part 8) (Acosta, H)
04/04/2021	469 (3 pgs) Exhibit List <i>Debtors' Supplement to Exhibit List for Hearing to be Held Commencing April 5, 2021</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> , 131 Motion to dismiss case , 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee, 214 Motion to appoint trustee). (Garman, Gregory)
04/04/2021	470 (16 pgs) Amended Witness and Exhibit List filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 460 List (witness/exhibit/generic), 464 List (witness/exhibit/generic)). (Gruber, G.)
04/04/2021	471 (26 pgs) Amended Witness and Exhibit List filed by Interested Party Attorney General of the State of New York (RE: related document(s) 463 List (witness/exhibit/generic)). (Van Horn, Eric)
04/05/2021	472 (87 pgs; 4 docs) Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3) (Garman, Gregory)
04/05/2021	473 (16 pgs) Notice <i>Ackerman McQueen, Inc.'s Deposition Designations for Hearing on Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, In the Alternative, Motion for the Appointment of a Chapter 11 Trustee</i> filed by Creditor Ackerman McQueen, Inc.. (Gruber, G.)
04/05/2021	 474 (1 pg) PDF with attached Audio File - **4/5/21 AM SESSION** Court Date & Time [04/05/2021 10:32:44 AM]. File Size [19800 KB]. Run Time [01:24:54]. (admin). Modified on 4/5/2021 (Bergreen, J.).
04/05/2021	475 (19 pgs) Notice <i>Designation of Depositions & Prior Testimony</i> filed by Interested Party Attorney General of the State of New York. (Van Horn, Eric)
04/05/2021	476 (7 pgs) Notice <i>Debtors' Designation of Deposition Testimony</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/05/2021	Announcement of PASS TO ANOTHER PRELIMINARY HEARING regarding hearing scheduled for 4/14/2021. Hearing continued to 4/21/2021 at 02:00 per Natalie Lynn Arbaugh, filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.). (Arbaugh, Natalie)
04/05/2021	477 (10 pgs) Amended Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.)., 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay REDACTED Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.). Preliminary hearing to be held on 4/21/2021 at 02:00 PM Dallas Judge Hale Ctrm. (Arbaugh, Natalie)
04/05/2021	478 Request for transcript regarding a hearing held on 4/5/2021. The requested turn-around time is hourly (Bergreen, J.)
04/05/2021	479 (31 pgs) Transcript regarding Hearing Held 03/19/2021 (31 pages) RE: Motion to Compel





	Discovery and Motion for Protective Order. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/6/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 430 Hearing held on 3/19/2021. (RE: related document(s) 372 Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC.) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED IN PART.), 431 Hearing held on 3/19/2021. (RE: related document(s) 382 Motion for protective order <i>and to Stay Rule 30(b)(6) Deposition</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Exhibit Declaration of J. Sheehan)) (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED IN PART.)). Transcript to be made available to the public on 07/6/2021. (Rehling, Kathy)
04/05/2021	480 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/6/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)
04/05/2021	481 (5 pgs; 2 docs) Motion to pay <i>Debtors' Motion for Authority to Pay Mediation Fee</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) Modified on 4/6/2021 (Kerr, S.).
04/05/2021	482 (6 pgs) Support/supplemental document <i>Master Service List for Debtors' Motion for Authority to Pay Mediation Fee</i> filed by Debtor National Rifle Association of America (RE: related document(s) 481 Motion to pay <i>Debtors' Motion for Authority to Page Mediation Fee</i>). (Neligan, Patrick)
04/05/2021	483 (11 pgs; 2 docs) Motion for expedited hearing(related documents 481 Motion to pay) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (DE #481 GRANTED ORALLY; NO HEARING REQUIRED) Modified on 4/6/2021 (Bergreen, J.).
04/05/2021	486 INCORRECT ENTRY - Hearing set (RE: related document(s) 1 Non-individual Chapter 11 Voluntary Petition. Fee Amount \$1738 Filed by National Rifle Association of America Chapter 11 Plan due by 05/17/2021. Disclosure Statement due by 05/17/2021.) Hearing to be held on 4/5/2021 at 01:00 PM Dallas Judge Hale Ctrm for 1 , (Bergreen, J.) (Entered: 04/06/2021)
04/05/2021	 521 (1 pg) PDF with attached Audio File **4/5/21 PM SESSION 1** Court Date & Time [04/05/2021 01:16:02 PM]. File Size [22234 KB]. Run Time [01:36:54]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/05/2021	 522 (1 pg) PDF with attached Audio File **4/5/21 PM SESSION 2** Court Date & Time [04/05/2021 03:07:27 PM]. File Size [25991 KB]. Run Time [01:53:39]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/05/2021	 523 (1 pg) PDF with attached Audio File **4/5/21 PM SESSION 3** Court Date & Time [04/05/2021 05:07:12 PM]. File Size [15425 KB]. Run Time [01:07:36]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/06/2021	484 (26 pgs) Amended Witness and Exhibit List <i>Second Amended Witness and Exhibit List</i> filed by




	Interested Party Attorney General of the State of New York (RE: related document(s) 471 List (witness/exhibit/generic)). (Van Horn, Eric)
04/06/2021	485 (1 pg) Clerk's correspondence requesting an order from attorney for debtor. (RE: related document(s) 341 Motion for protective order <i>Debtors' Emergency Motion for Protective Order Re: NYAG's Notice of Intention to Take Deposition of the Honorable Phillip Journey</i> Filed by Debtor National Rifle Association of America) Responses due by 4/20/2021. (Kerr, S.)
04/06/2021	487 (56 pgs) Transcript regarding Hearing Held 4/5/2021 RE: 131, motion to dismiss case filed by Ackerman McQueen; 163, motion to appoint a Chapter 11 Trustee; 423, motion to dismiss filed by District of Columbia Attorney General, AM SESSION ONLY. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/6/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Cindy Sumner, Telephone number 2148027196. (RE: related document(s) 480 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/6/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/6/2021. (Sumner, Cindy)
04/06/2021	488 (43 pgs) Declaration re: -- <i>Declaration of Luzmarina Vargas Regarding Summaries of Invoices</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 463 List (witness/exhibit/generic)). (Pronske, Gerrit)
04/06/2021	489 (4 pgs) Order granting application to employ Norton Rose Fulbright US LLP as Attorney for the Official Committee of Unsecured Creditors (related document # 336) Entered on 4/6/2021. (Bradden, T.)
04/06/2021	490 (5 pgs) Order granting application to employ AlixPartners, LLP as Financial Adviser to the Official Committee of Unsecured Creditors (related document # 337) Entered on 4/6/2021. (Bradden, T.)
04/06/2021	491 Request for transcript regarding a hearing held on 4/6/2021. The requested turn-around time is hourly (Bergreen, J.)
04/06/2021	492 (16 pgs) Amended Witness and Exhibit List <i>Third Amended</i> filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 470 List (witness/exhibit/generic)). (Gruber, G.)
04/06/2021	493 (2 pgs) Order granting motion for authority to pay mediation fee (related document # 481) Entered on 4/6/2021. (Bradden, T.)
04/06/2021	494 (195 pgs; 5 docs) Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4) (Garman, Gregory)
04/06/2021	495 (3 pgs) Motion for expedited hearing (related documents 472 Motion to quash, 494 Objection) <i>Motion for Emergency Hearing on (1) Debtors' Motion to Exclude Testimony from Dr. Erica Harris and (2) Debtors' Objections to Deposition Testimony from Prior Unrelated Cases and for Which Witnesses are not Unavailable and Request to Exclude the Same</i> Filed by Debtor National Rifle Association of America,



	Jointly Administered Party/Debtor Sea Girt, LLC (Garman, Gregory) (GRANTED ORALLY; DE #472 SET FOR HEARING ON 4/8/21 AT 9:00 AM VIA WEBEX) Modified on 4/7/2021 (Bergreen, J.).
04/06/2021	496 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/7/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)
04/06/2021	497 (204 pgs) Transcript regarding Hearing Held 04/05/2021 (204 pages) (Afternoon Docket Only) RE: Motions. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/6/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com , Telephone number 972-786-3063. (RE: related document(s) 480 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/6/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/6/2021. (Rehling, Kathy)
04/06/2021	499 (128 pgs) Transcript regarding Hearing Held 04/06/21 RE: Morning Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/6/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Transcripts Plus, Inc., Telephone number 215-862-1115 CourtTranscripts@aol.com . (RE: related document(s) 496 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/7/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/6/2021. (Hartmann, Karen)
04/06/2021	 526 (1 pg) PDF with attached Audio File **4/6/21 PM SESSION 1** Court Date & Time [04/06/2021 01:15:26 PM]. File Size [36142 KB]. Run Time [02:38:36]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/06/2021	 527 (1 pg) PDF with attached Audio File **4/6/21 PM SESSION 2** Court Date & Time [04/06/2021 04:09:36 PM]. File Size [26794 KB]. Run Time [01:57:42]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/06/2021	 647 (1 pg) PDF with attached Audio File **4/6/21 AM SESSION 1** Court Date & Time

	[04/06/2021 09:04:20 AM]. File Size [20223 KB]. Run Time [01:26:45]. (admin). Modified on 4/20/2021 (Green, Shanette). (Entered: 04/20/2021)
04/06/2021	 649 (1 pg) PDF with attached Audio File **4/6/21 AM SESSION 2** Court Date & Time [04/06/2021 10:45:20 AM]. File Size [17344 KB]. Run Time [01:14:24]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/20/2021)
04/07/2021	500 Request for transcript regarding a hearing held on 4/7/2021. The requested turn-around time is hourly (Bergreen, J.)
04/07/2021	501 (166 pgs) Transcript regarding Hearing Held 04/06/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/6/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 496 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/7/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/6/2021. (Bowen, James)
04/07/2021	502 (6 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 494 , (Neligan, Patrick)
04/07/2021	503 (2 pgs) Declaration re: <i>Declaration of Daniel L. Schmutter on Behalf of Proposed Ordinary Course Professional Hartman & Winnicki, P.C.</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
04/07/2021	504 (37 pgs) Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc.) <i>Debtors' Objections to Ackerman McQueen, Inc.'s Deposition Designations and Counter-Designations Thereto</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/07/2021	505 (36 pgs) Objection to (related document(s): 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objections to Attorney General of the State of New York's Designations of Depositions & Prior Testimony and Designations Thereto</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/07/2021	506 (13 pgs) Amended Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle

	Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay <i>REDACTED</i> Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.)). Preliminary hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale . (Arbaugh, Natalie)
04/07/2021	507 (7 pgs) Notice of Master Service List as of April 7, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/07/2021	508 (6 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3), 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 494 and for 472 , (Garman, Gregory)
04/07/2021	509 (2 pgs) Notice of Appearance and Request for Notice by Philip Kent Correll filed by Interested Party Wayne LaPierre. (Correll, Philip)
04/07/2021	510 (7 pgs) Objection to (related document(s): 476 Notice (generic) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) <i>NYAG'S OBJECTIONS TO DEBTORS DESIGNATIONS OF DEPOSTIONS AND COUNTER-DESIGNATIONS THERETO</i> filed by Interested Party Attorney General of the State of New York. (Van Horn, Eric)
04/07/2021	511 (37 pgs) Amended Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc.) <i>Debtors' Amended Objections to Ackerman McQueen, Inc.'s Deposition Designations and Counter-Designations Thereto</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/07/2021	512 (36 pgs) Amended Objection to (related document(s): 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Amended Objection to Attorney General of the State of New York's Designations of Depositions & rior Testimony and Designations Thereto</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/07/2021	513 (3 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing Scheduled to be Held on April 12, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 369 Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> , 378 Application to employ CBRE, Inc. as Broker <i>Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker</i>). (Neligan, Patrick)
04/07/2021	514 (3 pgs) Amended Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 494 , (Neligan, Patrick)


04/07/2021	515 (3 pgs) Declaration re: <i>Declaration of Stephanie Bono on Behalf of Proposed Ordinary Course Professional Morgan Stanley Smith Barney LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business). (Neligan, Patrick)
04/07/2021	516 Hearing held and continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 114 and for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.). Modified to include link to DE 114 on 4/7/2021 (Bergreen, J.).
04/07/2021	517 (62 pgs) Response opposed to (related document(s): 504 Objection filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) filed by Creditor Ackerman McQueen, Inc.. (Acosta, H)
04/07/2021	518 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 369 Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> , 378 Application to employ CBRE, Inc. as Broker <i>Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker</i>). (Smith, Laura)
04/07/2021	519 (47 pgs; 3 docs) Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
04/07/2021	520 (11 pgs; 2 docs) Motion for expedited hearing(related documents 519 Application to employ) <i>Motion for Expedited Consideration</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick)
04/07/2021	 529 (1 pg) PDF with attached Audio File **4/7/21 AM SESSION** Court Date & Time [04/07/2021 10:32:36 AM]. File Size [21464 KB]. Run Time [01:32:13]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/07/2021	 530 (1 pg) PDF with attached Audio File **4/7/21 PM SESSION 1** Court Date & Time [04/07/2021 01:15:43 PM]. File Size [6296 KB]. Run Time [00:27:27]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/07/2021	 531 (1 pg) PDF with attached Audio File **4/7/21 PM SESSION 2** Court Date & Time [04/07/2021 01:57:43 PM]. File Size [15251 KB]. Run Time [01:06:43]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/07/2021	 532 (1 pg) PDF with attached Audio File **4/7/21 PM SESSION 3** Court Date & Time [04/07/2021 03:15:35 PM]. File Size [22309 KB]. Run Time [01:38:00]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)





04/07/2021	 533 (1 pg) PDF with attached Audio File **4/7/21 PM SESSION 4** Court Date & Time [04/07/2021 05:04:16 PM]. File Size [12109 KB]. Run Time [00:53:04]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/08/2021)
04/08/2021	524 Request for transcript regarding a hearing held on 4/8/2021. The requested turn-around time is hourly (Bergreen, J.)
04/08/2021	525 (2 pgs) Declaration re: <i>Declaration of Jeffery Banish On Behalf of Proposed Ordinary Course Professional Troutman Pepper Hamilton Sanders LLP</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
04/08/2021	534 (2 pgs) Declaration re: <i>Declaration of Kenneth G. Turkel on Behalf of Proposed Ordinary Course Professional Bajo Cuva Cohen Turkel</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
04/08/2021	535 (2 pgs) Declaration re: <i>Declaration of Matthew C. Albrecht on Behalf of Proposed Ordinary Course Professional Albrecht Law PLLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney <i>Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business</i>). (Neligan, Patrick)
04/08/2021	 536 (1 pg) PDF with attached Audio File **4/8/21 AM SESSION** Court Date & Time [04/08/2021 09:03:37 AM]. File Size [40770 KB]. Run Time [02:59:11]. (admin). Modified on 4/8/2021 (Bergreen, J.).
04/08/2021	537 Hearing held on 4/8/2021 (RE: related document(s) 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) (MOTION WITHDRAWN ON THE RECORD) (Bergreen, J.)
04/08/2021	538 Hearing held (RE: related document(s) 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle LLC). (MATTER TAKEN UNDER ADVISEMENT AND RESET TO 4/12/21 AT 1:30 PM; COURT WILL RULE AT THAT TIME OR BEFORE). Hearing to be held on 4/12/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 494 , (Bergreen, J.)
04/08/2021	 539 (1 pg) PDF with attached Audio File **4/8/21 PM SESSION 1** Court Date & Time [04/08/2021 01:15:25 PM]. File Size [19166 KB]. Run Time [01:23:50]. (admin). Modified on 4/8/2021 (Bergreen, J.).
04/08/2021	540 HEARING HELD AND CONTINUED TO 4/13/21 AT 9:00 AM - (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/13/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)

04/08/2021	 541 (1 pg) PDF with attached Audio File **4/8/21 PM SESSION 2** Court Date & Time [04/08/2021 02:50:19 PM]. File Size [29063 KB]. Run Time [02:07:40]. (admin). Modified on 4/8/2021 (Bergreen, J.).
04/08/2021	 542 (1 pg) PDF with attached Audio File **4/8/21 PM SESSION 3** Court Date & Time [04/08/2021 05:03:37 PM]. File Size [12020 KB]. Run Time [00:51:36]. (admin). Modified on 4/9/2021 (Bergreen, J.).
04/08/2021	543 (172 pgs) Transcript regarding Hearing Held 04/07/2021 (172 pages) (Afternoon Docket Only) RE: Motions. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/7/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 516 Hearing held and continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 114 and for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.). Modified to include link to DE 114 on 4/7/2021 (Bergreen, J.). Transcript to be made available to the public on 07/7/2021. (Rehling, Kathy)
04/08/2021	544 (123 pgs) Transcript regarding Hearing Held 04/08/21 RE: MORNING SESSION. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/7/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Transcripts Plus, Inc., Telephone number 215-862-1115 CourtTranscripts@aol.com. (RE: related document(s) 540 HEARING HELD AND CONTINUED TO 4/13/21 AT 9:00 AM - (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/13/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/7/2021. (Hartmann, Karen)
04/08/2021	545 (9 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 490 Order granting application to employ AlixPartners, LLP as Financial Adviser to the Official Committee of Unsecured Creditors (related document 337) Entered on 4/6/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 04/08/2021. (Admin.)
04/08/2021	546 (6 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 493 Order granting motion for authority to pay mediation fee (related document 481) Entered on 4/6/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 04/08/2021. (Admin.)
04/08/2021	756 (1 pg) Sealed court admitted exhibits date of hearing 04/08/2021. NRA EXHIBITS 38, 39, AND 40 ADMITTED UNDER SEAL. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.),

	155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.) (Green, Shanette) (Entered: 06/09/2021)
04/09/2021	548 (1 pg) Clerk's correspondence requesting an order from attorney for debtor. (RE: related document(s) 372 Motion to compel re: discovery The State of New York to (i) Respond to Debtors' Document Requests or Admit no Documents Exist and (ii) Produce a Representative Under Fed. R. Civ. P. 30(b)(6) Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J)) Responses due by 4/23/2021. (Kerr, S.)
04/09/2021	549 (1 pg) Clerk's correspondence requesting an order from attorney for interested party. (RE: related document(s) 382 Motion for protective order <i>and to Stay Rule 30(b)(6) Deposition</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Exhibit Declaration of J. Sheehan)) Responses due by 4/23/2021. (Kerr, S.) Modified on 4/9/2021 (Kerr, S.).
04/09/2021	550 (20 pgs; 3 docs) Motion to pay <i>Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
04/09/2021	551 (11 pgs; 2 docs) Motion for expedited hearing(related documents 550 Motion to pay) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #550 SET FOR HEARING ON 4/21/21 AT 2:00 PM VIA WEBEX) Modified on 4/9/2021 (Bergreen, J.).
04/09/2021	552 (5 pgs) Order granting motion for expedited hearing (Related Doc# 520)(document set for hearing: 519 Application to employ) Hearing to be held on 4/16/2021 at 08:00 AM Dallas Judge Hale Ctrm for 519 and for 519 , Entered on 4/9/2021. (Blanco, J.)
04/09/2021	553 (4 pgs) Notice <i>Agenda of Matters Scheduled for Hearing on April 12, 2021 at 1:30 P.M. (CDT)</i> filed by Debtor National Rifle Association of America (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 369 Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> Filed by Debtor National Rifle Association of America Objections due by 3/30/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B), 378 Application to employ CBRE, Inc. as Broker <i>Debtor National Rifle Association of America's Application to Employ CBRE, Inc. as Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)). (Neligan, Patrick)
04/12/2021	554 (5 pgs) Agreed Order granting application to employ BVA Group Restructuring and Advisory, LLC as Financial Adviser (related document # 349) Entered on 4/12/2021. (Bradden, T.)
04/12/2021	555 (12 pgs) Notice of Omnibus Hearing Date filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/12/2021	556 (9 pgs) Final Order authorizing the debtors to continue use of existing cash management system, maintain existing bank accounts, pay certain costs and fees associated with credit card transactions, and continue use of existing business forms (related document # 5) Entered on 4/12/2021. (Bradden, T.)
04/12/2021	557 (46 pgs) Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the</i>

	<i>D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021. (Loegering, Rebecca)
04/12/2021	558 (14 pgs) Notice of hearing filed by Interested Party Wilson Phillips (RE: related document(s) 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021.). Hearing to be held on 5/5/2021 at 01:30 PM VIDEO CONFERENCE for 557 , (Loegering, Rebecca)
04/12/2021	Receipt of filing fee for Motion for relief from stay(21-30085-hdh11) [motion,mrlfsty] (188.00). Receipt number 28633967, amount \$ 188.00 (re: Doc# 557). (U.S. Treasury)
04/12/2021	559 (61 pgs) Transcript regarding Hearing Held 4/7/2021 RE: 114, motion to appoint a Trustee; 131, motion to dismiss case filed by Ackerman McQueen; 155, motion to dismiss case filed by Attorney General for the State of New York; 163, motion to appoint a Trustee filed by Attorney General State of New York; 214 Motion to appoint a Trustee filed by Attorney General District of Columbia; 423, motion to dismiss filed by Attorney General for District of Columbia. AM SESSION ONLY. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/12/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Cindy Sumner, Telephone number 2148027196. (RE: related document(s) 516 Hearing held and continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 114 and for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.). Modified to include link to DE 114 on 4/7/2021 (Bergreen, J.). Transcript to be made available to the public on 07/12/2021. (Sumner, Cindy)
04/12/2021	560 (12 pgs) Notice of hearing <i>Notice of Reset Hearing</i> filed by Debtor National Rifle Association of America (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 78 , (Neligan, Patrick)
04/12/2021	561 (4 pgs) Objection to (related document(s): 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) filed by Creditor Ford Motor Credit Company LLC, 236 Amended Motion for adequate protection (related document: 231) filed by Creditor Ford Motor Credit Company LLC) <i>Debtors' Objection to Motions for Relief from the Automatic Stay Filed by Ford Motor Credit LLC</i> filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/12/2021	562 (2 pgs) Declaration re: <i>Declaration of Sonya Rowling</i> filed by Debtor National Rifle Association of America (RE: related document(s) 561 Objection). (Neligan, Patrick)
04/12/2021	563 (3 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing Scheduled for April 14, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230), 236 Amended Motion for adequate protection (related document: 231)). (Neligan, Patrick)
04/12/2021	627 Hearing held on 4/12/2021. (RE: related document(s) 369 Motion to borrow/incur debt <i>Debtors' Motion for Authority to Enter into Postpetition Agreement for Replacement of Roof to NRA Headquarters</i> Filed by Debtor National Rifle Association of America Objections due by 3/30/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B), (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) 378 Application to employ CBRE, Inc. as Broker <i>Debtor National Rifle Association of America's Application</i>

	<i>to Employ CBRE, Inc. as Real Estate Broker</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C), (FINDINGS OF FACT CONCLUSIONS OF LAW; GRANTED.) 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)) (FINDINGS OF FACT CONCLUSIONS OF LAW; THE COURT READ INTO RECORD RULING.) (Green, Shanette) (Entered: 04/19/2021)
04/13/2021	564 Request for transcript regarding a hearing held on 4/13/2021. The requested turn-around time is hourly (Bergreen, J.)
04/13/2021	565 Request for transcript (ruling only) regarding a hearing held on 3/31/2021. The requested turn-around time is hourly (Bergreen, J.)
04/13/2021	566 (7 pgs) Transcript regarding Hearing Held 03/31/2021 (7 pages) (Excerpt: Ruling Only) RE: Motion to Compel Discovery (406), Motion to Preclude (417). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/12/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 498 Hearing held on 3/31/2021 (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc. (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION DENIED WITHOUT PREJUDICE); 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION DENIED WITHOUT PREJUDICE) (Bergreen, J.)). Transcript to be made available to the public on 07/12/2021. (Rehling, Kathy)
04/13/2021	567 Request for transcript regarding a hearing held on 3/4/2021. The requested turn-around time is 3-day expedited (Bergreen, J.)
04/13/2021	Announcement of WITHDRAWAL OF MOTION by Stephen Wilcox regarding hearing scheduled for 4/14/2021, filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230) Filed by Creditor Ford Motor Credit Company LLC (Attachments: # 1 Mailing Matrix # 2 Commerciallease Master Lease Agreement dated July 5, 2014 # 3 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 4 Certificate of Title on a 2017 Ford Expedition, Vehicle Identification Number 1FMJK1JT1HEA54902 # 5 Motor Vehicle Lease Agreement dated April 25, 2018 on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 6 Certificate of Title on a 2018 Ford Explorer, Vehicle Identification Number 1FM5K8DH3JGB04775 # 7 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442 # 8 Supplement to Commerciallease Master Lease Agreement dated July 5, 2014 on a 2017 Ford Expedition, Vehicle Identification Number 1FMJU1JT2HEA85442)). (Wilcox, Stephen)
04/13/2021	Announcement of WITHDRAWAL OF MOTION by Stephen Wilcox regarding hearing scheduled for 4/14/2021, filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 236 Amended Motion for adequate protection (related document: 231) Filed by Creditor Ford Motor Credit Company LLC). (Wilcox, Stephen)
04/13/2021	568 (9 pgs) Notice of Appearance and Request for Notice by Kelsey Mullens Taylor filed by Creditor Ackerman McQueen, Inc.. (Taylor, Kelsey)
04/13/2021	 569 (1 pg) PDF with attached Audio File **4/13/21 AM SESSION 1** Court Date & Time





	[04/13/2021 08:01:35 AM]. File Size [23272 KB]. Run Time [01:40:00]. (admin). Modified on 4/13/2021 (Green, Shanette).
04/13/2021	570 (4 pgs; 2 docs) Withdrawal filed by Creditor Ford Motor Credit Company LLC (RE: related document(s) 235 Amended Motion for relief from stay <i>or, in the alternative, request for adequate protection</i> (related document: 230), 236 Amended Motion for adequate protection (related document: 231)). (Attachments: # 1 Mailing matrix) (Wilcox, Stephen)
04/13/2021	 571 (1 pg) PDF with attached Audio File **4/13/21 AM SESSION 2** Court Date & Time [04/13/2021 10:00:08 AM]. File Size [19071 KB]. Run Time [01:21:52]. (admin). Modified on 4/13/2021 (Green, Shanette).
04/13/2021	 572 (1 pg) PDF with attached Audio File **4/13/21 AM SESSION 3** Court Date & Time [04/13/2021 11:26:20 AM]. File Size [9994 KB]. Run Time [00:42:51]. (admin). Modified on 4/13/2021 (Green, Shanette).
04/13/2021	573 Hearing continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/16/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)
04/13/2021	 574 (1 pg) PDF with attached Audio File **4/13/21 PM SESSION 1** Court Date & Time [04/13/2021 01:34:08 PM]. File Size [40427 KB]. Run Time [02:53:28]. (admin). Modified on 4/13/2021 (Green, Shanette).
04/13/2021	 575 (1 pg) PDF with attached Audio File **4/13/21 PM SESSION 2** Court Date & Time [04/13/2021 04:33:21 PM]. File Size [20207 KB]. Run Time [01:26:42]. (admin). Modified on 4/14/2021 (Green, Shanette).
04/14/2021	576 (1 pg) Clerk's correspondence requesting an order from attorney for debtor. (RE: related document(s) 393 Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B)) Responses due by 4/28/2021. (Kerr, S.)
04/14/2021	577 (12 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 550 Motion to pay <i>Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). Hearing to be held on 4/21/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 550 , (Neligan, Patrick)
04/14/2021	578 (179 pgs) Transcript regarding Hearing Held 04/13/2021 (Trial Day 5 - Afternoon Only) (179 pages) RE: Motions. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/13/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com , Telephone number 972-786-3063. (RE: related document(s) 573 Hearing continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman



	McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/16/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/13/2021. (Rehling, Kathy)
04/14/2021	579 (3 pgs) Objection to (related document(s): 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch filed by Debtor National Rifle Association of America</i>) " LIMITED OBJECTION TO DEBTORS' APPLICATION FOR APPOINTMENT OF LOUIS E. ROBICHAUX IV AS CHIEF RESTRUCTURING OFFICER " filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider, Bart Skelton. (Taylor, Clay)
04/14/2021	580 (9 pgs) Trustee's Objection to <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> (RE: related document(s) 519 Application to employ) (Lambert, Lisa)
04/14/2021	581 (69 pgs; 6 docs) Reply to (related document(s): 121 Objection filed by Debtor National Rifle Association of America) (<i>Redacted Reply to 63 Motion to Modify Automatic Stay</i>) filed by Creditor Christopher Cox. (Attachments: # 1 Buchanan Declaration # 2 Exhibits 1 - 7 # 3 Exhibit 8 # 4 Exhibits 9-21 # 5 Exhibit 22) (Arbaugh, Natalie)
04/14/2021	582 (9 pgs; 2 docs) Motion to file document under seal. (<i>Certain Portions of and Exhibits to Reply in Support of 63 Motion to Modify the Automatic Stay</i>) Filed by Creditor Christopher Cox (Attachments: # 1 Proposed Order) (Arbaugh, Natalie)
04/14/2021	583 (13 pgs) Amended Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay REDACTED Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.)). Preliminary hearing to be held on 4/21/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale . (Arbaugh, Natalie)
04/14/2021	584 (156 pgs) Transcript regarding Hearing Held 4/13/2021 RE: Trial. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/13/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Liberty Transcripts/Dipti Patel, Telephone number 847-848-4907. (RE: related document(s) 573 Hearing continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/16/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/13/2021. (Patel, Dipti)

04/14/2021	585 (11 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 556 Final Order authorizing the debtors to continue use of existing cash management system, maintain existing bank accounts, pay certain costs and fees associated with credit card transactions, and continue use of existing business forms (related document 5) Entered on 4/12/2021. (Bradden, T.)) No. of Notices: 26. Notice Date 04/14/2021. (Admin.)
04/15/2021	587 (7 pgs) Response unopposed to (related document(s): 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> filed by Creditor Phillip Journey, Creditor Roscoe B. Marshall, Creditor Esther Schneider, Creditor Owen "Buz" Mills) filed by Creditor Committee Official Committee of Unsecured Creditors. (Strubeck, Louis)
04/15/2021	588 (13 pgs; 2 docs) Response unopposed to (related document(s): 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch</i> filed by Debtor National Rifle Association of America) filed by Creditor Committee Official Committee of Unsecured Creditors. (Attachments: # 1 Exhibit A) (Strubeck, Louis)
04/15/2021	589 (47 pgs; 3 docs) Witness and Exhibit List in Connection with Hearing on Motion to Appoint a Member Committee filed by U.S. Trustee United States Trustee (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i>). (Attachments: # 1 Exhibit 2 - DellAquila 2d Amended Complaint # 2 Exhibit 3 Dell Aquilla Opinion) (Lambert, Lisa)
04/15/2021	590 (74 pgs; 2 docs) Objection to (related document(s): 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch</i> filed by Debtor National Rifle Association of America) filed by Interested Party Attorney General of the State of New York. (Attachments: # 1 Exhibit October 2020 Bylaws) (Van Horn, Eric)
04/16/2021	591 (31 pgs) Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> Filed by Interested Party Attorney General of the State of New York (Kathman, Jason)
04/16/2021	592 (7 pgs; 2 docs) Motion for expedited hearing(related documents 591 Motion for leave) Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Proposed Order) (Van Horn, Eric)(GRANTED ORALLY; DE #591 SET FOR HEARING ON 4/19/21 AT 4:00 PM VIA WEBEX) Modified on 4/16/2021 (Bergreen, J.).
04/16/2021	593 (323 pgs; 15 docs) Declaration re: <i>Declaration of Monica Connell in Support of the State of New York's Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit S.</i> (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N) (Kathman, Jason)
04/16/2021	594 (6 pgs) Motion to file document under seal. <i>Certain Exhibits to the Declaration of Monica Connell in Support of the State of New York's Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> Filed by Interested Party Attorney General of the State of New York (Kathman, Jason)

04/16/2021	595 (16 pgs) Objection to (related document(s): 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch</i> filed by Debtor National Rifle Association of America) filed by Creditor Ackerman McQueen, Inc.. (Acosta, H)
04/16/2021	596 (16 pgs) Amended Witness and Exhibit List <i>Fourth Amended</i> filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 492 List (witness/exhibit/generic)). (Mason, Brian)
04/16/2021	597 (40 pgs) Amended Witness and Exhibit List <i>for Hearing to be Held Commencing April 5, 2021</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 462 List (witness/exhibit/generic), 469 List (witness/exhibit/generic)). (Garman, Gregory)
04/16/2021	598 Request for transcript regarding a hearing held on 4/16/2021. The requested turn-around time is hourly (Bergreen, J.)
04/16/2021	599 (6 pgs) Notice of hearing filed by Interested Party Attorney General of the State of New York (RE: related document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> Filed by Interested Party Attorney General of the State of New York, 593 Declaration re: <i>Declaration of Monica Connell in Support of the State of New York's Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit S). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N)). Hearing to be held on 4/19/2021 at 04:00 PM at https://us-courts.webex.com/meet/hale for 591 and for 593. (Kathman, Jason)</i>
04/16/2021	600 (3 pgs) Order granting motion of Christopher W. Cox for leave to file under seal certain portions of and exhibits to his reply in support of his motion to modify the automatic stay (related document # 582) Entered on 4/16/2021. (Bradden, T.)
04/16/2021	601 (35 pgs) Transcript regarding Hearing Held 03/04/2021 THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/15/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Veritext Legal Solutions, Telephone number 516-608-2400. (RE: related document(s) 289 Hearing held on 3/4/2021. (RE: related document(s) 6 Motion to pay <i>Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A/Interim Order)) (FINAL ORDER ENTERED 3/2/21.), 290 Hearing held on 3/4/2021. (RE: related document(s) 82 Application to employ Neligan LLP as Attorney <i>Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtor</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (APPROVED.), 291 Hearing held on 3/4/2021. (RE: related document(s) 84 Application to employ Brewer Attorneys & Counselors as Attorney <i>as Special Counsel for Debtors and Debtors in Possession</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A_Retention Application Proposed Order # 2 Exhibit B_Declaration of M. Collins # 3 Exhibit C_Declaration of Meadows # 4 Exhibit D_Declaration of Frazer # 5 Exhibit E_Disclosure)) (RESET UNTIL AFTER TRUSTEE HEARING HAS BEEN RULED ON.), 292 Hearing held on 3/4/2021. (RE: related document(s) 112 Motion to establish procedures for interim compensation and reimbursement of expenses for certain professionals. Filed by Debtor National Rifle Association of America (Kerr, S.)) (GRANTED.), 293 Hearing held on 3/4/2021.



	(RE: related document(s) 132 Application to employ Garman Turner Gordon LLP as Attorney Debtors' Application for Entry of An Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (APPROVED.), 297 Hearing held on 3/4/2021. (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)) (GRANTED; K&L WILL FILE A SEPARATE APPLICATION.)). Transcript to be made available to the public on 07/15/2021. (Rupa, Dion)
04/16/2021	602 SEALED document regarding: CHRISTOPHER W. COX'S REPLY IN SUPPORT OF HIS MOTION TO MODIFY THE AUTOMATIC STAY per court order filed by Creditor Christopher Cox (RE: related document(s) 600 Order on motion to seal). (Attachments: # 1 Buchanan Declaration # 2 Exhibit 1 # 3 Exhibit 2 # 4 Exhibit 3 # 5 Exhibit 4 # 6 Exhibit 5 # 7 Exhibit 6 # 8 Exhibit 7 # 9 Exhibit 8 # 10 Exhibit 9 # 11 Exhibit 10 # 12 Exhibit 11 # 13 Exhibit 12 # 14 Exhibit 13 # 15 Exhibit 14 # 16 Exhibit 15 # 17 Exhibit 16 # 18 Exhibit 17 # 19 Exhibit 18 # 20 Exhibit 19 # 21 Exhibit 20 # 22 Exhibit 21 # 23 Exhibit 22) (Arbaugh, Natalie)
04/16/2021	603 (4 pgs) Witness and Exhibit List filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i>). (Watson, Marcus)
04/16/2021	604 (63 pgs; 4 docs) INCORRECT ENTRY: INCORRECT EVENT CODE RE - Application to employ Helm Promotions, LLC as Other Professional Debtors' Motion for Authority to Enter Into Postpetition Agreement with Helm Promotions, LLC to Operate the NRA Store and License Certain NRA Trademarks and Logos Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) Objections due 5/19/21 (Neligan, Patrick) Modified on 4/19/2021 (Kerr, S.). Modified on 4/19/2021 (Bergreen, J.).
04/16/2021	605 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). Debtors' Motion for Waiver of the Requirements of Section 345(b), 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> , 447 Application to employ Briglia Hundley, P.C. as Attorney Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel, 550 Motion to pay Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs). (Smith, Laura)
04/16/2021	606 (49 pgs; 4 docs) Witness and Exhibit List Debtors' Witness and Exhibit List Relating to Application of Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as Debtors' Chief Restructuring Officer filed by Debtor National Rifle Association of America (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch). (Attachments: # 1 Exhibit 2 # 2 Exhibit 3 # 3 Exhibit 4) (Neligan, Patrick)
04/16/2021	607 (15 pgs) Objection to (related document(s): 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> filed by Creditor Phillip Journey, Creditor Roscoe B. Marshall, Creditor Esther Schneider, Creditor Owen "Buz" Mills) Debtors' Limited Objection to Motion for Appointment of a Member Committee filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/16/2021	608 (63 pgs; 4 docs) Motion to sell NRA Branded Merchandise NOTE: THE PROPERTY TO BE SOLD PURSUANT TO THIS MOTION TO SELL WILL NOT BE SOLD FREE AND CLEAR OF LIENS. Debtors' Motion for Authority to Enter Into Postpetition Agreement with Helm Promotions LLC to Operate the NRA Store and License Certain NRA Trademarks and Logos Filed by Debtor National Rifle





	Association of America Objections due by 5/19/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick) Modified on 4/19/2021 (Kerr, S.).
04/16/2021	609 (5 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing to be Held on April 21, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 63 Motion for relief from stay Fee amount \$188,, 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order , 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b), <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> , 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> , 447 Application to employ Briglia Hundley, P.C. as Attorney <i>Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel</i> , 550 Motion to pay Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs). (Neligan, Patrick)
04/16/2021	610 (79 pgs; 7 docs) Motion to pay <i>Debtors' Motion for Authority to Retain and Pay Litigation Experts</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F) (Neligan, Patrick)
04/16/2021	611 (10 pgs; 2 docs) Motion for expedited hearing(related documents 610 Motion to pay) Filed by Debtor National Rifle Association of America (Attachments: # 1 Proposed Order) (Neligan, Patrick) (GRANTED ORALLY; DE #610 SET FOR HEARING ON 4/29/21 AT 1:30 PM VIA WEBEX) Modified on 4/19/2021 (Bergreen, J.).
04/16/2021	 612 (1 pg) PDF with attached Audio File **4/16/21 AM SESSION 1** Court Date & Time [04/16/2021 08:03:14 AM]. File Size [22865 KB]. Run Time [01:38:05]. (admin). Modified on 4/16/2021 (Green, Shanette).
04/16/2021	 613 (1 pg) PDF with attached Audio File **4/16/21 AM SESSION 2** Court Date & Time [04/16/2021 09:59:16 AM]. File Size [21881 KB]. Run Time [01:33:54]. (admin). Modified on 4/16/2021 (Green, Shanette).
04/16/2021	 614 (1 pg) PDF with attached Audio File **4/16/21 AM SESSION 3** Court Date & Time [04/16/2021 11:37:56 AM]. File Size [5426 KB]. Run Time [00:23:16]. (admin). Modified on 4/16/2021 (Green, Shanette).
04/16/2021	 615 (1 pg) PDF with attached Audio File **4/16/21 PM SESSION 1** Court Date & Time [04/16/2021 01:16:24 PM]. File Size [23959 KB]. Run Time [01:42:43]. (admin). Modified on 4/16/2021 (Green, Shanette).
04/16/2021	619 Hearing held on 4/16/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL HELD; TO RESUME TUESDAY, APRIL 20 AT 8:00 AM.) (Green, Shanette) (Entered: 04/19/2021)

04/16/2021	 625 (1 pg) PDF with attached Audio File **4/16/21 PM SESSION 2** Court Date & Time [04/16/2021 03:05:19 PM]. File Size [24004 KB]. Run Time [01:42:57]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/19/2021)
04/16/2021	 626 (1 pg) PDF with attached Audio File **4/16/21 PM SESSION 3** Court Date & Time [04/16/2021 04:57:09 PM]. File Size [17935 KB]. Run Time [01:16:49]. (admin). Modified file date on 4/20/2021 (Bergreen, J.). (Entered: 04/19/2021)
04/18/2021	616 (8 pgs) INCORRECT ENTRY: Incorrect information indicated in document. Trustee's Objection to <i>Motion to Appoint a Member Committee</i> (RE: related document(s) 406 Motion to compel re: discovery) (Lambert, Lisa) Modified on 4/19/2021 (Kerr, S.).
04/19/2021	617 (28 pgs) Response opposed to (related document(s): 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit S filed by Interested Party Attorney General of the State of New York) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)</i>
04/19/2021	618 (14 pgs) Declaration re: <i>of Teresa Pilatowicz in Support of Debtors' Response in opposition to the State of New York's Motion to (1) Preclude Debtors from Offering Evidence in Support of the Sufficiency or Completeness of Debtors' Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 617 Response). (Garman, Gregory)
04/19/2021	620 (150 pgs) Transcript regarding Hearing Held 04/16/21 RE: TRIAL (MORNING SESSION ONLY). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/19/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Transcripts Plus, Inc., Telephone number 215-862-1115 CourtTranscripts@aol.com. (RE: related document(s) 619 Hearing held on 4/16/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL HELD; TO RESUME TUESDAY, APRIL 20 AT 8:00 AM.)). Transcript to be made available to the public on 07/19/2021. (Hartmann, Karen)
04/19/2021	621 Hearing continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America).





	Hearing to be held on 4/20/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)
04/19/2021	622 (12 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 610 Motion to pay <i>Debtors' Motion for Authority to Retain and Pay Litigation Experts</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F)). Hearing to be held on 4/29/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 610 , (Neligan, Patrick)
04/19/2021	623 (219 pgs) Transcript regarding Hearing Held 04/16/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/19/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 619 Hearing held on 4/16/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL HELD; TO RESUME TUESDAY, APRIL 20 AT 8:00 AM.)). Transcript to be made available to the public on 07/19/2021. (Bowen, James)
04/19/2021	624 (7 pgs) Response opposed to (related document(s): 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/19/2021	628 (11 pgs; 3 docs) Declaration re: <i>First Supplemental Declaration of Louis E. Robichaux IV</i> filed by Debtor National Rifle Association of America (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch.</i> (Attachments: # 1 Exhibit 1 # 2 Exhibit 2) (Neligan, Patrick)
04/19/2021	629 (16 pgs; 2 docs) Amended Witness and Exhibit List <i>Debtors' Supplemental Witness and Exhibit List Relating to Application of Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group LLC and Appointment of Louis E. Robichaux IV as Debtors' Chief Restructuring Officer to be held On April 20, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 606 List (witness/exhibit/generic)). (Attachments: # 1 Exhibit 5) (Neligan, Patrick)
04/19/2021	630 (17 pgs) Amended Witness and Exhibit List <i>Fifth Amended</i> filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 596 List (witness/exhibit/generic)). (Gruber, G.)
04/19/2021	631 (3 pgs; 2 docs) Witness and Exhibit List <i>Application to Employ Ankura Consulting Group, LLC and Louis E. Robichaux IV</i> filed by U.S. Trustee United States Trustee (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch.</i> (Attachments: # 1 Exhibit UST-2 Email Re Supplement Disclosure) (Lambert, Lisa)
04/19/2021	693 Hearing held on 4/19/2021. (RE: related document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of</i>



	<i>Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006 Filed by Interested Party Attorney General of the State of New York) (FINDINGS OF FACT CONCLUSIONS OF LAW; THE COURT READ RULING INTO THE RECORD; DENIED.) (Green, Shanette) (Entered: 04/26/2021)</i>
04/20/2021	632 (4 pgs) Witness and Exhibit List filed by Interested Party Attorney General of the State of New York (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch.</i> (Van Horn, Eric)
04/20/2021	633 Request for transcript regarding a hearing held on 4/20/2021. The requested turn-around time is hourly (Bergreen, J.)
04/20/2021	634 (11 pgs) Response opposed to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc.) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Garman, Gregory)
04/20/2021	Announcement of PASS TO ANOTHER PRELIMINARY HEARING regarding hearing scheduled for 4/21/2021. Hearing continued to 5/19/2021 at 01:30 per Natalie Lynn Arbaugh, filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.). (Arbaugh, Natalie)
04/20/2021	635 (13 pgs) Amended Notice of hearing filed by Creditor Christopher Cox (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.)., 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay <i>REDACTED</i> Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.).). Hearing to be held on 5/19/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale . (Arbaugh, Natalie) Modified on 4/20/2021 (Kerr, S.).
04/20/2021	636 (12 pgs) Notice of hearing filed by Debtor National Rifle Association of America (RE: related document(s) 608 Motion to sell NRA Branded Merchandise NOTE: THE PROPERTY TO BE SOLD PURSUANT TO THIS MOTION TO SELL WILL NOT BE SOLD FREE AND CLEAR OF LIENS. <i>Debtors' Motion for Authority to Enter Into Postpetition Agreement with Helm Promotions LLC to Operate the NRA Store and License Certain NRA Trademarks and Logos</i> Filed by Debtor National Rifle Association of America Objections due by 5/19/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick) Modified on 4/19/2021 (Kerr, S.).). Hearing to be held on 5/19/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 608 , (Neligan, Patrick)
04/20/2021	637 (7 pgs) Notice of Master Service List as of April 20, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/20/2021	638 (6 pgs) Amended Notice of hearing filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order)). Hearing to be held on 5/19/2021 at 02:00 PM at https://us-courts.webex.com/meet/hale for 416 , (Watson, Marcus)
04/20/2021	639 (3 pgs) Witness and Exhibit List filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of</i>






	<i>Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch). (Smith, Laura)</i>
04/20/2021	 640 (1 pg) PDF with attached Audio File **4/20/21 AM SESSION 1** Court Date & Time [04/20/2021 08:04:09 AM]. File Size [25109 KB]. Run Time [01:47:45]. (admin). Modified on 4/20/2021 (Green, Shanette).
04/20/2021	 641 (1 pg) PDF with attached Audio File **4/20/21 AM SESSION 2** Court Date & Time [04/20/2021 10:06:23 AM]. File Size [15787 KB]. Run Time [01:07:42]. (admin). Modified on 4/20/2021 (Green, Shanette).
04/20/2021	642 (6 pgs) Notice <i>Debtors' Amended Designation of Deposition Testimony</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 476 Notice <i>Debtors' Designation of Deposition Testimony</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC.). (Garman, Gregory)
04/20/2021	643 (4 pgs) Notice of Agenda of Matters Scheduled for Hearing on April 21, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)
04/20/2021	644 (5 pgs) Witness and Exhibit List filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch). (Acosta, H)</i>
04/20/2021	645 (10 pgs) Notice of Amendment to National Rifle Association of America's Schedule A, Question 75 filed by Debtor National Rifle Association of America (RE: related document(s) 161 Schedules: Schedules A/B and D-H with Summary of Assets and Liabilities (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Debtor National Rifle Association of America., 175 Amended Schedules: A/B, H, (with Declaration Under Penalty of Perjury for Non-Individual Debtors,). Filed by Debtor National Rifle Association of America.). (Neligan, Patrick)
04/20/2021	646 (3 pgs) Notice of Cancellation of Hearing filed by Debtor National Rifle Association of America (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 75 SEALED Motion to (I) Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) for Related Relief per court order filed by Creditor Christopher Cox (RE: related document(s) 74 Order on motion to seal (Attachments: # 1 Declaration # 2 Proposed Order); 63 Motion for relief from stay REDACTED Fee amount \$188, filed by Creditor Christopher Cox. (Arbaugh, Natalie). MODIFIED linkage to include link to redacted motion on 1/28/2021 (Bergreen, J.), 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order), 447 Application to employ Briglia Hundley, P.C. as Attorney <i>Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D), 550 Motion to pay <i>Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)). (Neligan, Patrick)
04/20/2021	648 Hearing held and continued to 4/21/2021 at 10:30 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163


	<p>Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214</p> <p>Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/21/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155, (Bergreen, J.) Modified text on 4/21/2021 (Bergreen, J.).</p>
04/20/2021	<p>650 (22 pgs) Affidavit of Service filed by Debtor National Rifle Association of America (RE: related document(s)80 Meeting of creditors Chapter 11). (Neligan, Patrick)</p>
04/20/2021	<p>651 (150 pgs) Transcript regarding Hearing Held 04/20/21 RE: TRIAL (MORNING SESSION ONLY). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/19/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Transcripts Plus, Inc., Telephone number 215-862-1115 CourtTranscripts@aol.com. (RE: related document(s) 648 Hearing held and continued to 5/21/2021 at 10:30 AM (RE: related document(s)114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/21/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155, (Bergreen, J.)). Transcript to be made available to the public on 07/19/2021. (Hartmann, Karen)</p>
04/20/2021	<p>652 (18 pgs) Debtor-in-possession monthly operating report for filing period March 1, 2021 to March 31, 2021 filed by Debtor National Rifle Association of America. (Neligan, Patrick)</p>
04/20/2021	<p>653 (9 pgs) Debtor-in-possession monthly operating report for filing period March 1, 2021 to March 31,2021 filed by Jointly Administered Party/Debtor Sea Girt, LLC. (Neligan, Patrick)</p>
04/20/2021	<p> 663 (1 pg) PDF with attached Audio File **4/20/21 AM SESSION 3** Court Date & Time [04/20/2021 11:24:34 AM]. File Size [2577 KB]. Run Time [00:11:01]. (admin). Modified on 4/21/2021 (Green, Shanette). (Entered: 04/21/2021)</p>
04/20/2021	<p> 664 (1 pg) PDF with attached Audio File **4/20/21 AM SESSION 4** Court Date & Time [04/20/2021 11:37:55 AM]. File Size [8987 KB]. Run Time [00:38:33]. (admin). Modified on 4/21/2021 (Green, Shanette). (Entered: 04/21/2021)</p>
04/20/2021	<p> 676 (1 pg) PDF with attached Audio File **4/20/2021 PM SESSION 1** Court Date & Time [04/20/2021 01:30:55 PM]. File Size [16533 KB]. Run Time [01:10:55]. (admin). Modified on 4/22/2021 (Bergreen, J.). (Entered: 04/22/2021)</p>
04/20/2021	<p> 677 (1 pg) PDF with attached Audio File **4/20/2021 PM SESSION 2** Court Date & Time [04/20/2021 02:49:37 PM]. File Size [20167 KB]. Run Time [01:26:30]. (admin). Modified on</p>




	4/22/2021 (Bergreen, J.). (Entered: 04/22/2021)
04/21/2021	654 (157 pgs) Transcript regarding Hearing Held 04/08/21 RE: AMENDED AFTERNOON SESSION. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/20/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 537 Hearing held on 4/8/2021 (RE: related document(s) 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) (MOTION WITHDRAWN ON THE RECORD) (Bergreen, J.), 538 Hearing held (RE: related document(s) 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rif LLC). (MATTER TAKEN UNDER ADVISEMENT AND RESET TO 4/12/21 AT 1:30 PM; COURT WILL RULE AT THAT TIME OR BEFORE). Hearing to be held on 4/12/2021 at 01:30 PM at https://us-courts.webex.com/meet/hale for 494 , (Bergreen, J.), 540 HEARING HELD AND CONTINUED TO 4/13/21 AT 9:00 AM - (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/13/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/20/2021. (Bowen, James)
04/21/2021	655 Request for transcript regarding a hearing held on 4/21/2021. The requested turn-around time is hourly (Bergreen, J.)
04/21/2021	656 (2 pgs) Order authorizing the debtors to enter into postpetition agreement for repair and replacement of roof at NRA headquarters (related document # 369) Entered on 4/21/2021. (Bradden, T.)
04/21/2021	657 (2 pgs) Order granting application to employ CBRE, Inc. as Real Estate Broker (related document # 378) Entered on 4/21/2021. (Bradden, T.)
04/21/2021	658 (2 pgs) Order granting in part and denying in part debtors' objections to deposition testimony from prior unrelated cases and for which witnesses are not available and request to exclude the same (RE: related document(s) 494 Objection filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC). Entered on 4/21/2021 (Bradden, T.)
04/21/2021	659 (4 pgs) Unopposed Order granting application to employ Briglia Hundley, P.C. as Special Litigation Counsel for the debtors and debtors in possession effective as of January 15, 2021 (related document # 447) Entered on 4/21/2021. (Bradden, T.)
04/21/2021	660 (121 pgs) Transcript regarding Hearing Held 04/20/2021 (121 pages) RE: Motions (Afternoon Docket Only). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/20/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com , Telephone number 972-786-3063. (RE: related document(s) 648 Hearing held and continued to 5/21/2021 at 10:30 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York, 214

	Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/21/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/20/2021. (Rehling, Kathy)
04/21/2021	661 (7 pgs) Response opposed to (related document(s): 642 Notice (generic) filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC) filed by Interested Party Attorney General of the State of New York. (Van Horn, Eric)
04/21/2021	662 Hearing held and continued to 4/22/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/22/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.) Modified text on 4/21/2021 (Bergreen, J.).
04/21/2021	 665 (1 pg) PDF with attached Audio File **4/21/21 AM SESSION** Court Date & Time [04/21/2021 10:32:07 AM]. File Size [20402 KB]. Run Time [01:27:28]. (admin). Modified on 4/21/2021 (Green, Shanette).
04/21/2021	 666 (1 pg) PDF with attached Audio File **4/21/21 PM SESSION 1** Court Date & Time [04/21/2021 01:15:24 PM]. File Size [22886 KB]. Run Time [01:38:14]. (admin). Modified on 4/21/2021 (Green, Shanette).
04/21/2021	 667 (1 pg) PDF with attached Audio File **4/21/21 PM SESSION 2** Court Date & Time [04/21/2021 03:00:55 PM]. File Size [19851 KB]. Run Time [01:25:08]. (admin). Modified on 4/21/2021 (Green, Shanette).
04/21/2021	 668 (1 pg) PDF with attached Audio File **4/21/21 PM SESSION 3** Court Date & Time [04/21/2021 04:37:09 PM]. File Size [20838 KB]. Run Time [01:29:15]. (admin). Modified on 4/21/2021 (Green, Shanette).
04/21/2021	Hearing NOT held on 4/21/2021. (RE: related document(s) 78 Motion to maintain bank accounts Waiver of Requirements of Section 345(b). <i>Debtors' Motion for Waiver of the Requirements of Section 345(b)</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (AGREED RESET TO 5/19/21 PER DEBTOR.) (Green, Shanette) (Entered: 04/26/2021)
04/21/2021	Hearing NOT held on 4/21/2021. (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order)) (TO BE RESET AFTER COURT HAS ISSUED A RULING ON THE MOTIONS TO DISMISS PER THE COURT.) (Green, Shanette) (Entered: 04/26/2021)




04/21/2021	Hearing NOT held on 4/21/2021. (RE: related document(s) 447 Application to employ Briglia Hundley, P.C. as Attorney Debtors' Application for Entry of an Order Pursuant to Section 327(3) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021 Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D)) (NO RESPONSES FILED; A/O TO BE UPLOADED.) (Green, Shanette) (Entered: 04/26/2021)
04/21/2021	Hearing NOT held on 4/21/2021. (RE: related document(s) 550 Motion to pay Motion for Entry of Amended Order Authorizing Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (AGREED RESET TO 5/19/21 PER DEBTOR.) (Green, Shanette) (Entered: 04/26/2021)
04/22/2021	669 Request for transcript regarding a hearing held on 4/22/2021. The requested turn-around time is hourly (Bergreen, J.)
04/22/2021	670 (184 pgs) Transcript regarding Hearing Held 04/21/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/21/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 662 Hearing held and continued to 4/22/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ Motion for Appointment of Examiner Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case Motion in Support of State of New York's Motion to Dismiss Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer Filed by Debtor National Rifle Association of America). Hearing to be held on 4/22/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.) Modified text on 4/21/2021 (Bergreen, J.). Transcript to be made available to the public on 07/21/2021. (Bowen, James)
04/22/2021	 671 (1 pg) PDF with attached Audio File **4/22/21 AM SESSION 1** Court Date & Time [04/22/2021 08:04:08 AM]. File Size [13623 KB]. Run Time [00:58:23]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	 672 (1 pg) PDF with attached Audio File **4/22/21 AM SESSION 2** Court Date & Time [04/22/2021 09:05:53 AM]. File Size [338 KB]. Run Time [00:01:26]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	673 (66 pgs) Transcript regarding Hearing Held 4/21/2021 RE: 114, motion to appoint a Trustee; 131, motion to dismiss filed by Ackerman McQueen; 155, motion to dismiss filed by New York Attorney General; 163, motion to appoint a Trustee; 214, motion to appoint a Trustee filed by DC Attorney General; 423, motion to dismiss filed by DC Attorney General. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/21/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Cindy Sumner, Telephone number 2148027196. (RE: related document(s) 662 Hearing held and continued to 4/22/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ Motion for Appointment of Examiner Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by


	Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/22/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.) Modified text on 4/21/2021 (Bergreen, J.). Transcript to be made available to the public on 07/21/2021. (Sumner, Cindy)
04/22/2021	 674 (1 pg) PDF with attached Audio File **4/22/21 AM SESSION 3** Court Date & Time [04/22/2021 09:15:56 AM]. File Size [16820 KB]. Run Time [01:11:59]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	 675 (1 pg) PDF with attached Audio File **4/22/21 AM SESSION 4** Court Date & Time [04/22/2021 10:45:23 AM]. File Size [19373 KB]. Run Time [01:23:06]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	678 Hearing Held and Continued to 4/23/21 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/23/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)
04/22/2021	 679 (1 pg) PDF with attached Audio File **4/22/21 PM SESSION 1** Court Date & Time [04/22/2021 01:38:38 PM]. File Size [2157 KB]. Run Time [00:09:13]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	 680 (1 pg) PDF with attached Audio File **4/22/21 PM SESSION 2** Court Date & Time [04/22/2021 01:53:36 PM]. File Size [17068 KB]. Run Time [01:13:10]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	 681 (1 pg) PDF with attached Audio File **4/22/21 PM SESSION 3** Court Date & Time [04/22/2021 03:21:04 PM]. File Size [1737 KB]. Run Time [00:07:25]. (admin). Modified on 4/22/2021 (Green, Shanette).
04/22/2021	682 (37 pgs; 2 docs) Notice of Stipulation Between the Debtors, the Official Committee of Unsecured Creditors, and Aronson LLC Regarding the Official Committee of Unsecured Creditors' Limited Objection to the Debtors' Retention of Aronson LLC as an Ordinary Course Professional filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 321 Order authorizing employment and payment of professionals utilized in the ordinary course of business (RE: related document(s) 90 Application to employ filed by Debtor National Rifle Association of America). Entered on 3/9/2021 (Bradden, T.), 334 Declaration re: <i>Declaration of Brenda L. Jayne on Behalf of Proposed Ordinary Course Professional Aronson LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of



	Business)., 412 Notice of Limited Objection to the Debtors' Retention of Aronson LLC as an Ordinary Course Professional filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 321 Order authorizing employment and payment of professionals utilized in the ordinary course of business (RE: related document(s) 90 Application to employ filed by Debtor National Rifle Association of America). Entered on 3/9/2021 (Bradden, T.), 334 Declaration re: <i>Declaration of Brenda L. Jayne on Behalf of Proposed Ordinary Course Professional Aronson LLC</i> filed by Debtor National Rifle Association of America (RE: related document(s) 90 Application to employ Ordinary Course Professionals as Attorney Debtors' Motion for an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business).). (Attachments: # 1 Exhibit A-Stipulation) (Gluck, Kristian)
04/22/2021	683 (150 pgs) Transcript regarding Hearing Held 04/22/21 RE: TRIAL (MORNING SESSION). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/21/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Transcripts Plus, Inc., Telephone number 215-862-1115 (CourtTranscripts@aol.com). (RE: related document(s) 678 Hearing Held and Continued to 4/23/21 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/23/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/21/2021. (Hartmann, Karen)
04/22/2021	684 (67 pgs) Transcript regarding Hearing Held 04/22/2021 (67 pages) RE: Motions (Afternoon Docket Only). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/21/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 678 Hearing Held and Continued to 4/23/21 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey; 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc.; 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York; 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York; 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia; 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America). Hearing to be held on 4/23/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/21/2021. (Rehling, Kathy)
04/23/2021	685 Request for transcript regarding a hearing held on 4/23/2021. The requested turn-around time is hourly (Bergreen, J.)
04/23/2021	 686 (1 pg) PDF with attached Audio File **4/23/21 AM SESSION 1** Court Date & Time [04/23/2021 08:02:20 AM]. File Size [19632 KB]. Run Time [01:24:04]. (admin). Modified on 4/23/2021 (Green, Shanette).



04/23/2021	 687 (1 pg) PDF with attached Audio File **4/23/21 AM SESSION 2** Court Date & Time [04/23/2021 09:36:36 AM]. File Size [25206 KB]. Run Time [01:47:58]. (admin). Modified on 4/23/2021 (Green, Shanette).
04/23/2021	 688 (1 pg) PDF with attached Audio File **4/23/21 AM SESSION 3** Court Date & Time [04/23/2021 11:29:52 AM]. File Size [13717 KB]. Run Time [00:58:52]. (admin). Modified on 4/23/2021 (Green, Shanette).
04/23/2021	 689 (1 pg) PDF with attached Audio File **4/23/21 PM SESSION** Court Date & Time [04/23/2021 01:19:22 PM]. File Size [4678 KB]. Run Time [00:20:01]. (admin). Modified on 4/23/2021 (Green, Shanette).
04/23/2021	690 (8 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 659 Unopposed Order granting application to employ Briglia Hundley, P.C. as Special Litigation Counsel for the debtors and debtors in possession effective as of January 15, 2021 (related document 447) Entered on 4/21/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 04/23/2021. (Admin.)
04/23/2021	691 (6 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 656 Order authorizing the debtors to enter into postpetition agreement for repair and replacement of roof at NRA headquarters (related document 369) Entered on 4/21/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 04/23/2021. (Admin.)
04/23/2021	694 Hearing Held and Continued to 4/29/21 at 8:00 AM. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 4/29/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Green, Shanette) (Entered: 04/26/2021)
04/26/2021	692 (166 pgs) Transcript regarding Hearing Held 04/06/21 RE: AMENDED AFTERNOON SESSION. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/26/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 496 Hearing held and continued (RE: related document(s) 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.)) Hearing to be held on 4/7/2021 at 10:30 AM at https://us-courts.webex.com/meet/hale for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/26/2021. (Bowen, James)




04/26/2021	695 (243 pgs; 5 docs) Objection to (related document(s): 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, filed by Interested Party Wilson Phillips) <i>Debtors' Objection to the Motion of Wilson Phillips to Modify the Automatic Stay to the Extent Applicable to Allow Payment, Reimbursement and/or Advancement of Defense Costs Under the D&O Policy</i> filed by Debtor National Rifle Association of America. (Attachments: # 1 Exhibit A-1 # 2 Exhibit A-2 # 3 Exhibit A-3 # 4 Exhibit B) (Neligan, Patrick)
04/27/2021	696 (21 pgs) Transcript regarding Hearing Held 04/23/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/26/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 694 Hearing Held and Continued to 4/29/21 at 8:00 AM. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 4/29/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 .) Transcript to be made available to the public on 07/26/2021. (Bowen, James)
04/27/2021	697 (186 pgs) Transcript regarding Hearing Held 4/23/2021 RE: 114 , motion to appoint Trustee; 131 , motion to dismiss filed by Ackerman McQueen; 155 motion to dismiss filed by New York AG; 163 , motion to appoint Trustee filed by NYAG; 214 , motion to appoint Trustee filed by DCAG; 423 , motion to dismiss filed by DCAG. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/26/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Cindy Sumner, Telephone number 2148027196. (RE: related document(s) 694 Hearing Held and Continued to 4/29/21 at 8:00 AM. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 4/29/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 .) Transcript to be made available to the public on 07/26/2021. (Sumner, Cindy)
04/27/2021	698 (4 pgs) Witness and Exhibit List <i>Debtors' Witness and Exhibit List for Hearing Scheduled for April 29, 2021</i> filed by Debtor National Rifle Association of America (RE: related document(s) 610 Motion to pay <i>Debtors' Motion for Authority to Retain and Pay Litigation Experts</i>). (Neligan, Patrick)

04/28/2021	699 (81 pgs) Support/supplemental document <i>Exhibit B to Debtors' Objection to Motion of Wilson Phillips to Modify the Automatic Stay, to the Extend Applicable, to Allow Payment, Reimbursement and/or Advanced Defense Costs Under the D&O Policy</i> filed by Debtor National Rifle Association of America (RE: related document(s) 695 Objection). (Neligan, Patrick)
04/28/2021	700 Redacted transcript. (RE: related document(s) 543 Transcript regarding Hearing Held 04/07/2021 (172 pages) (Afternoon Docket Only) RE: Motions. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/7/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Kathy Rehling, kathyrehlingtranscripts@gmail.com, Telephone number 972-786-3063. (RE: related document(s) 516 Hearing held and continued (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> filed by Creditor Phillip Journey, 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc., 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia, 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia). Hearing to be held on 4/8/2021 at 09:00 AM at https://us-courts.webex.com/meet/hale for 114 and for 163 and for 423 and for 214 and for 131 and for 155 , (Bergreen, J.). Modified to include link to DE 114 on 4/7/2021 (Bergreen, J.). Transcript to be made available to the public on 07/7/2021.). (Rehling, Kathy)
04/28/2021	701 (50 pgs; 3 docs) Support/supplemental document <i>Debtors Supplement to Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> filed by Debtor National Rifle Association of America (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch.</i> (Attachments: # 1 Exhibit A # 2 Exhibit B) (Neligan, Patrick)
04/28/2021	702 (40 pgs) Amended Witness and Exhibit List <i>for Hearing to be Held Commencing April 5, 2021</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (RE: related document(s) 462 List (witness/exhibit/generic), 469 List (witness/exhibit/generic), 597 List (witness/exhibit/generic)). (Garman, Gregory)
04/29/2021	703 Request for transcript regarding a hearing held on 4/29/2021. The requested turn-around time is hourly (Bergreen, J.)
04/29/2021	 704 (1 pg) PDF with attached Audio File **4/29/21 AM SESSION 1** Court Date & Time [04/29/2021 08:01:31 AM]. File Size [24154 KB]. Run Time [01:43:32]. (admin). Modified on 4/29/2021 (Green, Shanette).
04/29/2021	 705 (1 pg) PDF with attached Audio File **4/29/21 AM SESSION 2** Court Date & Time [04/29/2021 10:00:30 AM]. File Size [21587 KB]. Run Time [01:32:27]. (admin). Modified on 4/29/2021 (Green, Shanette).
04/29/2021	 706 (1 pg) PDF with attached Audio File **4/29/21 AM SESSION 3** Court Date & Time [04/29/2021 11:37:48 AM]. File Size [6414 KB]. Run Time [00:27:29]. (admin). Modified on 4/29/2021 (Green, Shanette).
04/29/2021	707 (1 pg) Clerk's correspondence requesting the appropriate document to resolve the motion from attorney for debtor. (RE: related document(s) 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3)) Responses due by 5/13/2021. (Kerr, S.)

04/29/2021	708 (4 pgs) Amended Notice of hearing filed by Interested Party Wilson Phillips (RE: related document(s) 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021.). Hearing to be held on 5/19/2021 at 01:30 PM Dallas Judge Hale Ctrm for 557 , (Loegering, Rebecca)
04/29/2021	709 (4 pgs) Notice of Supplemental Comment filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 701 Support/supplemental document <i>Debtors Supplement to Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> filed by Debtor National Rifle Association of America (RE: related document(s) 519 Application to employ Ankura Consulting Group LLC as Other Professional <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Ch.</i> (Attachments: # 1 Exhibit A # 2 Exhibit B)). (Strubeck, Louis)
04/29/2021	 710 (1 pg) PDF with attached Audio File **4/29/21 PM SESSION 1** Court Date & Time [04/29/2021 01:31:27 PM]. File Size [30647 KB]. Run Time [02:11:22]. (admin). Modified on 4/29/2021 (Green, Shanette).
04/29/2021	711 Hearing held and continued to 5/3/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 5/3/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)
04/29/2021	712 (157 pgs) Transcript regarding Hearing Held 04/29/21 RE: TRIAL (MORNING). THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/28/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. (RE: related document(s) 711 Hearing held and continued to 5/3/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 5/3/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 07/28/2021. (Hartmann, Karen)

04/29/2021	 714 (1 pg) PDF with attached Audio File **4/29/21 PM SESSION 2** Court Date & Time [04/29/2021 03:59:30 PM]. File Size [12749 KB]. Run Time [00:54:41]. (admin). Modified on 4/30/2021 (Green, Shanette). (Entered: 04/30/2021)
04/29/2021	 715 (1 pg) PDF with attached Audio File **4/29/21 PM SESSION 3** Court Date & Time [04/29/2021 05:08:50 PM]. File Size [2871 KB]. Run Time [00:12:16]. (admin). Modified on 4/30/2021 (Green, Shanette). (Entered: 04/30/2021)
04/29/2021	717 Hearing held on 4/29/2021. (RE: related document(s) 610 Motion to pay <i>Debtors' Motion for Authority to Retain and Pay Litigation Experts</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F)) (FINDINGS OF FACT CONCLUSIONS OF LAW; MOTION GRANTED.) (Green, Shanette) (Entered: 04/30/2021)
04/29/2021	757 (2 pgs) Court admitted exhibits date of hearings 4/5/2021, 4/6/2021, 4/7/2021, 4/8/2021, 4/13/2021, 4/16/2021, 4/20/2021, 4/21/2021, 4/23/2021, and 4/29/2021. ACKERMAN MCQUEEN EXHIBITS: 1, 10, 13, 14, 18, 19, 20, 33, 35, 38, 40, 41 (REDACTED), 46, 50, 66, 67 (REDACTED), 68, 72, 74, 78, 83 (REDACTED), 84, 121, 124, 125, 152, 163, 168, 176 ADMITTED. JOURNEY EXHIBITS 3, 11, AND 18 ADMITTED. NEW YORK ATTORNEY GENERAL EXHIBITS 1, 2, 3, 4, 5, 7 (REDACTED), 8, 9, 10, 11, 12, 13, 16, 17, 18, 22, 24, 50, 52, 53, 54, 55, 56, 60, 72, 74, 75, 79, 86, 89 (REDACTED), 95, 100, 107, 109, 111, 123, 128, 129, 130, 131, 134, 138, 142, 143, 144, 148, 151, 153, 160, 162, 170, 172, 173, 174, 178, 181, 182, 188, 191, 193, 199, 201, 203, 208, 255, 257, 258, 270, 271, 272, 273, 276, 278, 285, 287, 288 (REDACTED), 298, 299, 300, 303, 314, 315, 316, 317, 322, 327, 339, 341, 347, 349, 354, 356, 360, 361, 362, 363 (REDACTED), 364, 366, 368, AND 369 ADMITTED. NRA EXHIBITS 15, 22, 23, 24, 57, 58, 65, 155, 174, 177, 189, 211, 222, 228, 261, 270, 271, 272, 273, 278, 280, 322, 323, 332, 530-546, 580, 581, 582, 591, 610-1 610-5 (FILED AT DKT #610), 661, 663, 664, 670, 672, 675, 687, 688, AND 689 ADMITTED. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3), 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) <i>Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same</i> filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 610 Motion to pay <i>Debtors' Motion for Authority to Retain and Pay Litigation Experts</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F)) (Green, Shanette) (Entered: 06/09/2021)
04/30/2021	713 (121 pgs) Transcript regarding Hearing Held 04/29/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 07/29/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 711 Hearing held and continued to 5/3/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: #

	1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 5/3/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.). Transcript to be made available to the public on 07/29/2021. (Bowen, James)
04/30/2021	716 (14 pgs; 3 docs) Amended Notice of hearing filed by Interested Party Wilson Phillips (RE: related document(s) 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021.). Hearing to be held on 5/19/2021 at 01:30 PM Dallas Judge Hale Ctrm for 557 , (Attachments: # 1 Dallas Webex Hearing Instructions # 2 Master Service List) (Loegering, Rebecca)
05/01/2021	718 (5 pgs) BNC certificate of mailing. (RE: related document(s) 707 Clerk's correspondence requesting the appropriate document to resolve the motion from attorney for debtor. (RE: related document(s) 472 Motion to quash <i>Debtors' Motion to Exclude Testimony from Dr. Erica Harris</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3)) Responses due by 5/13/2021. (Kerr, S.)) No. of Notices: 1. Notice Date 05/01/2021. (Admin.)
05/02/2021	719 (63 pgs) Chapter 11 plan filed by Debtor National Rifle Association of America. (Neligan, Patrick)
05/03/2021	720 Request for transcript (ENTIRE HEARING) regarding a hearing held on 5/3/2021. The requested turn-around time is hourly (Harden, D.)
05/03/2021	 721 (1 pg) PDF with attached Audio File **5/3/21 AM SESSION 1** Court Date & Time [05/03/2021 08:02:02 AM]. File Size [34346 KB]. Run Time [02:27:07]. (admin). Modified on 5/3/2021 (Green, Shanette).
05/03/2021	 722 (1 pg) PDF with attached Audio File **5/3/21 AM SESSION 2** Court Date & Time [05/03/2021 10:45:10 AM]. File Size [13659 KB]. Run Time [00:58:29]. (admin). Modified on 5/4/2021 (Green, Shanette). (Entered: 05/04/2021)
05/03/2021	724 Hearing held on 5/3/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL CONCLUDED; THE COURT ANNOUNCED ITS INTENTION TO ISSUE A RULING IN APPROXIMATELY 1 WEEK.) (Green, Shanette) (Entered: 05/04/2021)

05/03/2021	 728 (1 pg) PDF with attached Audio File **5/3/21 PM SESSION 1** Court Date & Time [05/03/2021 01:00:22 PM]. File Size [21440 KB]. Run Time [01:31:49]. (admin). Modified on 5/6/2021 (Green, Shanette). (Entered: 05/06/2021)
05/03/2021	 729 (1 pg) PDF with attached Audio File **5/3/21 PM SESSION 2** Court Date & Time [05/03/2021 02:43:01 PM]. File Size [18674 KB]. Run Time [01:19:59]. (admin). Modified on 5/6/2021 (Green, Shanette). (Entered: 05/06/2021)
05/03/2021	 731 (1 pg) PDF with attached Audio File **5/3/21 PM SESSION 3** Court Date & Time [05/03/2021 04:30:24 PM]. File Size [10360 KB]. Run Time [00:44:21]. (admin). Modified on 5/6/2021 (Green, Shanette). (Entered: 05/06/2021)
05/04/2021	723 (133 pgs) Transcript regarding Hearing Held 5/3/2021 RE: Trial. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/2/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Liberty Transcripts/Dipti Patel, Telephone number 8478484907. (RE: related document(s) 711 Hearing held and continued to 5/3/2021 at 8:00 AM (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) Hearing to be held on 5/3/2021 at 08:00 AM at https://us-courts.webex.com/meet/hale for 163 and for 114 and for 423 and for 214 and for 519 and for 131 and for 155 , (Bergreen, J.)). Transcript to be made available to the public on 08/2/2021. (Patel, Dipti)
05/05/2021	725 (137 pgs) Transcript regarding Hearing Held 05/03/21 RE: Afternoon Session. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/3/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (RE: related document(s) 724 Hearing held on 5/3/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case <i>or, in the alternative, to Appoint a Chapter 11 Trustee</i> Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL CONCLUDED; THE COURT ANNOUNCED ITS INTENTION TO ISSUE A RULING IN APPROXIMATELY 1 WEEK.)). Transcript to be made available to the public on 08/3/2021. (Bowen, James)

05/05/2021	Hearing NOT held on 5/5/2021. (RE: related document(s) 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021.) (TO BE RESET TO 5/19/21 AT 1:30 PM PER THE COURT.) (Green, Shanette) (Entered: 05/17/2021)
05/06/2021	726 (1 pg) INCORRECT ENTRY: Docketed in error. Clerk's correspondence requesting an order from attorney for Attorney General of the State of New York (RE: related document(s) 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Declaration of M. Connell in Support of Motion # 2 Proposed Order)) Responses due by 5/20/2021. (Kerr, S.) Modified on 5/11/2021 (Kerr, S.).
05/06/2021	727 (1 pg) INCORRECT ENTRY. Docketed in error. Clerk's correspondence requesting an order from attorney for creditor. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.) Responses due by 5/20/2021. (Kerr, S.) Modified on 5/11/2021 (Kerr, S.).
05/06/2021	730 (3 pgs) Order approving debtors' motion for authority to retain and pay litigation experts (related document # 610) Entered on 5/6/2021. (Bradden, T.)
05/07/2021	732 (1 pg) Clerk's correspondence requesting an order from attorney for Attorney General of the State of New York. (RE: related document(s) 393 Motion for protective order <i>Debtors Emergency Motion for Protective Order Re: NYAGs Notice of Intention to Take Deposition of Gayle Stanford</i> Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B)) Responses due by 5/21/2021. (Kerr, S.)
05/08/2021	733 (7 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 730 Order approving debtors' motion for authority to retain and pay litigation experts (related document 610) Entered on 5/6/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 05/08/2021. (Admin.)
05/10/2021	734 (4 pgs) Motion to appear pro hac vice for Seth C. Farber. Fee Amount \$100 Filed by Interested Party Wilson Phillips (Loegering, Rebecca)
05/10/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28701819, amount \$ 100.00 (re: Doc# 734). (U.S. Treasury)
05/10/2021	735 (3 pgs) Motion to appear pro hac vice for Daniel J. McGuire. Fee Amount \$100 Filed by Interested Party Wilson Phillips (Loegering, Rebecca)
05/10/2021	Receipt of filing fee for Motion to Appear pro hac vice(21-30085-hdh11) [motion,mprohac] (100.00). Receipt number 28701849, amount \$ 100.00 (re: Doc# 735). (U.S. Treasury)
05/11/2021	736 (1 pg) Clerk's correspondence requesting an order denying from attorney for debtor. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.) Responses due by 5/25/2021. (Kerr, S.)
05/11/2021	737 (1 pg) Clerk's correspondence requesting an order denying from attorney for debtor. (RE: related document(s) 417 Motion for leave -- <i>The State of New York's Motion to Preclude Debtors from Introducing Certain Evidence and Eliciting Certain Testimony They Have Shielded from Discovery Based Upon Inappropriate Privilege Assertions</i> Filed by Interested Party Attorney General of the State of New York (Attachments: # 1 Declaration of M. Connell in Support of Motion # 2 Proposed Order)) Responses due by 5/25/2021. (Kerr, S.)
05/11/2021	738 (1 pg) Clerk's correspondence requesting an order denying from attorney for debtor. (RE: related

	document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> Filed by Interested Party Attorney General of the State of New York) Responses due by 5/25/2021. (Kerr, S.)
05/11/2021	739 (2 pgs) Notice of Appearance and Request for Notice by Mark S. Werbner filed by Interested Party Wilson Phillips. (Werbner, Mark)
05/11/2021	740 (38 pgs) Order Granting Motions to Dismiss - mooted motion to dismiss Debtor without prejudice. (related document # 423), denying application to employ as Real estate broker (related document # 519), denying motion to appoint trustee. (related document # 114), mooted motion to dismiss Debtor without prejudice. (related document # 131), granting motion to dismiss Debtor without prejudice. (related document # 155), mooted motion to appoint trustee. (related document # 163), mooted motion to appoint trustee. (related document # 214) Entered on 5/11/2021. (Bradden, T.)
05/12/2021	741 (6 pgs; 2 docs) Notice of hearing(<i>status conference</i>) filed by Creditor Committee Official Committee of Unsecured Creditors (RE: related document(s) 740 Order Granting Motions to Dismiss - mooted motion to dismiss Debtor without prejudice. (related document 423), denying application to employ as Real estate broker (related document 519), denying motion to appoint trustee. (related document 114), mooted motion to dismiss Debtor without prejudice. (related document 131), granting motion to dismiss Debtor without prejudice. (related document 155), mooted motion to appoint trustee. (related document 163), mooted motion to appoint trustee. (related document 214) Entered on 5/11/2021. (Bradden, T.)). Hearing to be held on 5/14/2021 at 10:00 AM at https://us-courts.webex.com/meet/hale for 740 , (Attachments: # 1 Exhibit A) (Smith, Laura)
05/13/2021	742 (2 pgs) Order denying motion to (1) preclude debtors from offering evidence in support of the sufficiency or completeness of debtors' calculation of excess benefit transactions as to Wayne LaPierre; (2) admit NYAG exhibits 26,29,333,334; and (3) admit summary evidence pursuant to federal rule of evidence 1006 (related document # 591) Entered on 5/13/2021. (Bradden, T.)
05/13/2021	743 (5 pgs) BNC certificate of mailing. (RE: related document(s) 736 Clerk's correspondence requesting an order denying from attorney for debtor. (RE: related document(s) 406 Motion to compel re: discovery Discovery Filed by Creditor Ackerman McQueen, Inc.) Responses due by 5/25/2021. (Kerr, S.)) No. of Notices: 1. Notice Date 05/13/2021. (Admin.)
05/13/2021	744 (5 pgs) BNC certificate of mailing. (RE: related document(s) 738 Clerk's correspondence requesting an order denying from attorney for debtor. (RE: related document(s) 591 Motion for leave <i>Motion To (1) Preclude Debtors from offering Evidence in Support of the Sufficiency or Completeness of Debtors Calculation of Excess Benefit Transactions as to Wayne LaPierre; (2) Admit NYAG Exhibits 26, 29, 333, 334; and (3) Admit Summary Evidence Pursuant to Federal Rule of Evidence 1006</i> Filed by Interested Party Attorney General of the State of New York) Responses due by 5/25/2021. (Kerr, S.)) No. of Notices: 1. Notice Date 05/13/2021. (Admin.)
05/13/2021	745 (42 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 740 Order Granting Motions to Dismiss - mooted motion to dismiss Debtor without prejudice. (related document 423), denying application to employ as Real estate broker (related document 519), denying motion to appoint trustee. (related document 114), mooted motion to dismiss Debtor without prejudice. (related document 131), granting motion to dismiss Debtor without prejudice. (related document 155), mooted motion to appoint trustee. (related document 163), mooted motion to appoint trustee. (related document 214) Entered on 5/11/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 05/13/2021. (Admin.)
05/14/2021	746 Request for transcript regarding a hearing held on 5/14/2021. The requested turn-around time is hourly (Bergreen, J.)
05/14/2021	747 (25 pgs) Transcript regarding Hearing Held 5/14/2021 RE: Status Conference. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER

	<p>THE DATE OF FILING. TRANSCRIPT RELEASE DATE IS 08/12/2021. Until that time the transcript may be viewed at the Clerk's Office or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber Liberty Transcripts/Dipti Patel, Telephone number 8478484907. (RE: related document(s) 724 Hearing held on 5/3/2021. (RE: related document(s) 114 Motion to appoint trustee/ <i>Motion for Appointment of Examiner</i> Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case <i>Motion in Support of State of New York's Motion to Dismiss</i> Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker <i>Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer</i> Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B)) (TRIAL CONCLUDED; THE COURT ANNOUNCED ITS INTENTION TO ISSUE A RULING IN APPROXIMATELY 1 WEEK.)). Transcript to be made available to the public on 08/12/2021. (Patel, Dipti)</p>
05/14/2021	<p>749 Hearing held on 5/14/2021. (RE: related document(s) 1 Non-individual Chapter 11 Voluntary Petition. Fee Amount \$1738 Filed by National Rifle Association of America Chapter 11 Plan due by 05/17/2021. Disclosure Statement due by 05/17/2021.) (STATUS CONFERENCE HELD.) (Green, Shanette) (Entered: 05/17/2021)</p>
05/15/2021	<p>748 (6 pgs) BNC certificate of mailing - PDF document. (RE: related document(s) 742 Order denying motion to (1) preclude debtors from offering evidence in support of the sufficiency or completeness of debtors' calculation of excess benefit transactions as to Wayne LaPierre; (2) admit NYAG exhibits 26,29,333,334; and (3) admit summary evidence pursuant to federal rule of evidence 1006 (related document 591) Entered on 5/13/2021. (Bradden, T.)) No. of Notices: 1. Notice Date 05/15/2021. (Admin.)</p>
05/19/2021	<p>750 (10 pgs) Motion to extend time to Claims Bar Date (RE: related document(s) 80 Meeting of creditors Chapter 11) Filed by Creditor Ackerman McQueen, Inc. (Acosta, H)</p>
05/19/2021	<p>751 (5 pgs) Motion for expedited hearing (related documents 750 Motion to extend/shorten time) Filed by Creditor Ackerman McQueen, Inc. (Acosta, H) (GRANTED ORALLY; DE #750 SET FOR HEARING ON 5/21/2021 AT 10:00 AM VIA WEBEX) Modified on 5/20/2021 (Bergreen, J.).</p>
05/19/2021	<p>Hearing NOT held on 5/19/2021. (RE: related document(s) 63 Motion for relief from stay (REDACTED) Fee amount \$188, Filed by Creditor Christopher Cox Objections due by 2/8/2021. (Attachments: # 1 Declaration # 2 Proposed Order) (Arbaugh, Natalie) MODIFIED text to indicate "Redacted" on 1/26/2021 (Bergreen, J.), 557 Motion for relief from stay <i>For Entry of an Order Modifying the Automatic Stay, to the Extent Applicable, to Allow Payment, Reimbursement, and/or Advancement of Defense Costs Under the D&O Policy</i> Fee amount \$188, Filed by Interested Party Wilson Phillips Objections due by 4/26/2021.) (CASE DISMISSED; MOTIONS MOOT.) (Green, Shanette) (Entered: 05/20/2021)</p>
05/19/2021	<p>Hearing NOT held on 5/19/2021. (RE: related document(s) 416 Motion to appoint creditors committee/ <i>MOTION FOR THE APPOINTMENT OF A MEMBER COMMITTEE</i> Filed by Phillip Journey, Roscoe B. Marshall Jr., Owen "Buz" Mills, Esther Schneider (Attachments: # 1 Proposed Order), 608 Motion to sell NRA Branded Merchandise NOTE: THE PROPERTY TO BE SOLD PURSUANT TO THIS MOTION TO SELL WILL NOT BE SOLD FREE AND CLEAR OF LIENS. <i>Debtors' Motion for Authority to Enter Into Postpetition Agreement with Helm Promotions LLC to Operate the NRA Store and License Certain NRA Trademarks and Logos</i> Filed by Debtor National Rifle Association of America Objections due by 5/19/2021. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Neligan, Patrick) Modified on 4/19/2021 (Kerr, S.) (CASE DISMISSED; MOTIONS MOOT.) (Green, Shanette) (Entered: 05/20/2021)</p>

05/20/2021	752 (4 pgs) Stipulation by Ackerman McQueen, Inc. and Debtors, Creditors' Committee and US Trustee. filed by Creditor Ackerman McQueen, Inc. (RE: related document(s) 750 Motion to extend time to Claims Bar Date (RE: related document(s) 80 Meeting of creditors Chapter 11)). (Acosta, H)
05/20/2021	753 (4 pgs) Stipulation and Agreed Order regarding general bar date 750 Motion to extend time. Entered on 5/20/2021. (Bradden, T.)
06/07/2021	Bankruptcy case closed. Pursuant to LBR 9070-1, any exhibits that were admitted by the Court may be claimed and removed from the Clerks Office during the 60-day period following final disposition of a case by the attorney or party who introduced the exhibits. Any exhibit not removed within the 60-day period may be destroyed or otherwise disposed of by the Bankruptcy Clerk. (Kerr, S.)
06/07/2021	754 (2 pgs) Correspondence to the Court filed by Hal Irwin (RE: related document(s) 740 Order Granting Motions to Dismiss - mooted motion to dismiss Debtor without prejudice. (related document 423), denying application to employ as Real estate broker (related document 519), denying motion to appoint trustee. (related document 114), mooted motion to dismiss Debtor without prejudice. (related document 131), granting motion to dismiss Debtor without prejudice. (related document 155), mooted motion to appoint trustee. (related document 163), mooted motion to appoint trustee. (related document 214) Entered on 5/11/2021. (Bradden, T.)) (Rielly, Bill)
06/09/2021	755 (2 pgs) Order sealing certain trial exhibits 38, 39 and 40 (RE: related document(s) 131 Motion to dismiss case filed by Creditor Ackerman McQueen, Inc.). Entered on 6/9/2021 (Bradden, T.)
06/11/2021	758 (304 pgs; 2 docs) Notice of Filing Admitted Exhibits filed by Interested Party Attorney General of the State of New York (RE: related document(s) 757 Court admitted exhibits date of hearings 4/5/2021, 4/6/2021, 4/7/2021, 4/8/2021, 4/13/2021, 4/16/2021, 4/20/2021, 4/21/2021, 4/23/2021, and 4/29/2021. ACKERMAN MCQUEEN EXHIBITS: 1, 10, 13, 14, 18, 19, 20, 33, 35, 38, 40, 41 (REDACTED), 46, 50, 66, 67 (REDACTED), 68, 72, 74, 78, 83 (REDACTED), 84, 121, 124, 125, 152, 163, 168, 176 ADMITTED. JOURNEY EXHIBITS 3, 11, AND 18 ADMITTED. NEW YORK ATTORNEY GENERAL EXHIBITS 1, 2, 3, 4, 5, 7 (REDACTED), 8, 9, 10, 11, 12, 13, 16, 17, 18, 22, 24, 50, 52, 53, 54, 55, 56, 60, 72, 74, 75, 79, 86, 89 (REDACTED), 95, 100, 107, 109, 111, 123, 128, 129, 130, 131, 134, 138, 142, 143, 144, 148, 151, 153, 160, 162, 170, 172, 173, 174, 178, 181, 182, 188, 191, 193, 199, 201, 203, 208, 255, 257, 258, 270, 271, 272, 273, 276, 278, 285, 287, 288 (REDACTED), 298, 299, 300, 303, 314, 315, 316, 317, 322, 327, 339, 341, 347, 349, 354, 356, 360, 361, 362, 363 (REDACTED), 364, 366, 368, AND 369 ADMITTED. NRA EXHIBITS 15, 22, 23, 24, 57, 58, 65, 155, 174, 177, 189, 211, 222, 228, 261, 270, 271, 272, 273, 278, 280, 322, 323, 332, 530-546, 580, 581, 582, 591, 610-1 610-5 (FILED AT DKT #610), 661, 663, 664, 670, 672, 675, 687, 688, AND 689 ADMITTED. (RE: related document(s) 114 Motion to appoint trustee/ Motion for Appointment of Examiner Filed by Creditor Phillip Journey (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order), 131 Motion to dismiss case Filed by Creditor Ackerman McQueen, Inc. (Gruber, G.), 155 Motion to dismiss case or, in the alternative, to Appoint a Chapter 11 Trustee Filed by Interested Party Attorney General of the State of New York, 163 Motion to appoint trustee Filed by Interested Party Attorney General of the State of New York (Kerr, S.), 214 Motion to appoint trustee Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Attachments: # 1 Exhibit No. 1), 423 Motion to dismiss case Motion in Support of State of New York's Motion to Dismiss Filed by Creditor District of Columbia Office of the Attorney General for the District of Columbia (Alper, Nancy) Modified on 3/30/2021 (Kerr, S.), 472 Motion to quash Debtors' Motion to Exclude Testimony from Dr. Erica Harris Filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3), 494 Objection to (related document(s): 473 Notice (generic) filed by Creditor Ackerman McQueen, Inc., 475 Notice (generic) filed by Interested Party Attorney General of the State of New York) Debtors' Objection to Deposition Testimony from Prior Unrelated Cases and for which Witnesses are not Unavailable and Request to Exclude the Same filed by Debtor National Rifle Association of America, Jointly Administered Party/Debtor Sea Girt, LLC. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4), 519 Application to employ Ankura Consulting Group, LLC as Real Estate Broker Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B), 610 Motion to pay Debtors' Motion for Authority to Retain and Pay Litigation Experts Filed by Debtor National Rifle Association of America (Attachments: # 1 Exhibit A # 2 Exhibit B # 3

	Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F))). (Attachments: # 1 Exhibit NYAG EXHIBITS: 1, 2, 3, 4, 5, 7 (REDACTED), 8, 9, 10, 11, 12, 13, 16) (Van Horn, Eric)
06/11/2021	759 (62 pgs) Support/supplemental document NYAG EXHIBITS: 17, 18, 22 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	760 (295 pgs) Support/supplemental document NYAG EXHIBIT: 24 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	761 (128 pgs) Support/supplemental document NYAG EXHIBITS: 50, 52, 53, 54, 55, 56, 60, 72, 74, 75 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	762 (373 pgs) Support/supplemental document NYAG EXHIBITS: 79, 86, 89 (REDACTED), 95, 100, 107, 109 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	763 (287 pgs) Support/supplemental document NYAG EXHIBITS: 111, 123, 128, 129 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	764 (209 pgs) Support/supplemental document NYAG EXHIBITS: 130, 131, 134, 138, 142, 143, 144 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	765 (64 pgs) Support/supplemental document NYAG EXHIBITS: 148, 151, 153, 160, 162, 170, 172, 173, 174, 178, 181, 182, 188 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	766 (320 pgs) Support/supplemental document NYAG EXHIBITS: 191, 193, 199, 201, 203, 208, 255, 257, 258, 270, 271, 272, 273, 276 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	767 (129 pgs) Support/supplemental document NYAG EXHIBITS: 278, 285, 287, 288 (REDACTED), 298, 299, 300 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	768 (35 pgs) Support/supplemental document NYAG EXHIBITS: 303, 314, 315, 316, 317 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	769 (79 pgs) Support/supplemental document NYAG EXHIBITS: 322, 327 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	770 (173 pgs) Support/supplemental document NYAG EXHIBITS: 339, 341, 347, 349, 354, 356, 360, 361, 362, 363 (REDACTED), 364, 366 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/11/2021	771 (28 pgs) Support/supplemental document NYAG EXHIBITS: 368 & 369 filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)
06/22/2021	772 (9 pgs) Support/supplemental document Journey Admitted Exhibits filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Van Horn, Eric)

06/22/2021	773 (565 pgs; 2 docs) Support/supplemental document <i>Ackerman McQueen Admitted Exhibits</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Attachments: # 1 Supplement) (Van Horn, Eric)
06/22/2021	774 (644 pgs; 11 docs) Support/supplemental document <i>NRA Admitted Exhibits 15, 22-24</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Attachments: # 1 Supplement NRA 22 PART 1 # 2 NRA 22 -- PART 2 # 3 NRA 23 -- PART 1 # 4 NRA 23 -- PART 2 # 5 NRA 23 -- PART 3 # 6 NRA 23 -- PART 4 # 7 NRA 23 -- PART 5 # 8 NRA 24 -- PART 1 # 9 NRA 24 -- PART 2 # 10 NRA 24 -- PART 3) (Van Horn, Eric)
06/22/2021	775 (1341 pgs; 13 docs) Support/supplemental document <i>NRA Admitted Exhibits 57, 58, 65, 155, 174, 177, 189, 211, 222, 228, 261, 270-273</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Attachments: # 1 NRA 177, 189, 211, 222 # 2 NRA 228, 261, 270 # 3 NRA 271 -- PART 1 # 4 NRA 271 -- PART 2 # 5 NRA 272 -- PART 1 # 6 NRA 272 -- PART 2 # 7 NRA 272 -- PART 3 # 8 NRA 272 -- PART 4 # 9 NRA 272 -- PART 5 # 10 NRA 272 -- PART 6 # 11 NRA 273 -- PART 1 # 12 NRA 273 -- PART 2) (Van Horn, Eric)
06/22/2021	776 (1120 pgs; 3 docs) Support/supplemental document <i>NRA Admitted Exhibits 278, 280, 322, 323, 332, 531-533, 535-546, 580-582, 591, 661, 663, 664, 670, 672, 687-689</i> filed by Interested Party Attorney General of the State of New York (RE: related document(s) 758 Notice (generic)). (Attachments: # 1 NRA 544-546, 580, 581, 582, 591, 661 # 2 NRA 663, 664, 670, 672, 687, 688, and 689) (Van Horn, Eric)

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§ CASE NO. 21-30085-hdh-11
NATIONAL RIFLE ASSOCIATION §
OF AMERICA and SEA GIRT LLC, § CHAPTER 11
§
Debtors.¹ § Jointly Administered

THE STATE OF NEW YORK'S MEMORANDUM OF LAW
AND BRIEF IN SUPPORT OF MOTION TO DISMISS,
OR, IN THE ALTERNATIVE, TO APPOINT CHAPTER 11 TRUSTEE

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¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

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**TO THE HONORABLE HARLIN D. HALE,
CHIEF UNITED STATES BANKRUPTCY JUDGE:**

The People of the State of New York, by Letitia James, Attorney General of the State of New York (“**NYAG**”), a party in interest in the above-referenced bankruptcy case, hereby submit this *Memorandum of Law and Brief* (“**Brief**”) in Support of Motion to Dismiss, or, in the Alternative, Appoint Chapter 11 Trustee (“**Motion**”). In support of the Motion, the NYAG respectfully states as follows:

PRELIMINARY STATEMENT

1. The NYAG asks this Court to dismiss these bankruptcy cases as having been filed in bad faith pursuant to 11 U.S.C. § 1112. In the alternative, the NYAG asks that the Court to order the appointment a Chapter 11 trustee pursuant to 11 U.S.C. § 1104(a). Such relief is called for given the extraordinary facts present here.

2. The National Rifle Association of America, Inc. (“**NRA**”) seeks bankruptcy protection while claiming to be solvent and “in its strongest financial condition in years.” It invokes the jurisdiction of this Court while publicly proclaiming that it filed its petition because it is “dumping New York,” “utilizing the protection of the bankruptcy court,” and “organizing its legal and regulatory matters in an efficient forum,” essentially fleeing or seeking an end run around a pending regulatory enforcement action in New York (“**NYAG Enforcement Action**”).

3. The NRA’s bankruptcy petition, and that of its wholly-owned shell company Sea Girt LLC (“**Sea Girt**”), established in Texas three months ago as a toehold for these proceedings, were signed by the NRA’s highest officer, Executive Vice President, Wayne LaPierre (“**LaPierre**”). LaPierre is himself charged in the NYAG Enforcement Action with having “exploited the organization for his financial benefit, and the benefit of a close circle of NRA staff, board members, and vendors,” engaging in extensive self-dealing and corruption, and undertaking

efforts “to intimidate, punish, and expel anyone at a senior level who raised concerns about his conduct.” LaPierre is accused of looting the NRA, yet he has made the determination and signed the petitions in an effort to use the bankruptcy court to remove the NRA from regulatory oversight. The NYAG respectfully submits that the NRA’s conduct in filing this bankruptcy while claiming solvency and seeking to evade regulatory oversight is in bad faith such that dismissal under 11 U.S.C. § 1112 is appropriate under well-settled law.

4. Further the NYAG Enforcement Action sets forth extensive allegations of pervasive and persistent illegal conduct by the NRA and the individual defendants therein, including LaPierre and current Secretary and General Counsel John Frazer (“**Frazer**”). The action has survived motions to dismiss, as well as multiple efforts by the NRA to halt or transfer it, and is now in discovery. Based upon the facts alleged in the NYAG Enforcement Action, including those set forth below, and given the demonstrated dishonesty, fraud, and gross mismanagement by the NRA’s current management, including LaPierre and Frazer, if these bankruptcy cases are not dismissed, appointment of a trustee is appropriate under 11 U.S.C. § 1104(a).

BACKGROUND

I. The NYAG’s Regulatory Enforcement Action.

5. On August 6, 2020, after a fifteen-month-long investigation that involved the examination of numerous witnesses, including current and former NRA officers and employees, and review of tens of thousands of documents, the NYAG commenced the action styled *People of the State of New York, by Letitia James, Attorney General of the State of New York v. The National Rifle Association of America, Inc., et. al.*, Index No. 451625/2020. The 163-page Verified Complaint (“**NYAG Enforcement Complaint**”) filed in the Supreme Court of the State of New York (the “**NY State Court**”) presents detailed factual allegations of pervasive illegal conduct at

the NRA that, when taken together, reflect a system of widespread misuse of assets by LaPierre and his circle of insiders for their own private benefit. Inadequate internal controls, weak financial management systems easily susceptible to override, and lack of appropriate Board oversight lead to tens of millions of dollars being diverted away from the NRA's charitable mission and accordingly the reduction in expenditures for core program services. Further, the NRA consistently ignored, and in some cases retaliated against, those who raised concerns about its operation and finances, including members of its finance staff, multiple board members, and one former NRA President.²

6. As a result of the persistent violations of law alleged in the NYAG Enforcement Action, the NYAG asserted eighteen (18) distinct causes of action against both the NRA and certain individual defendants, including LaPierre, Frazer, Wilson Phillips, and Joshua Powell.³ The NYAG Enforcement Complaint seeks the following forms of relief: restitution of funds improperly paid to current and former officers, which will be returned to the NRA; a ban on certain current and former officers, including LaPierre and Frazer, from serving as fiduciaries of any New York charity; voiding of certain transactions; and, if a court determines that it is in the best interest of the NRA's members and the public, the dissolution of the NRA, in which case the NRA's restricted assets will be distributed to organizations pursuing a mission similar to the one the NRA purports to pursue.

² See generally NYAG Enforcement Complaint, attached as Exhibit 1 to the Appendix in Support of the New York Attorney General's Motion to Dismiss, or in the Alternative, to Appoint Chapter 11 Trustee ("Appendix"). All page number citations for the Appendix refer to the "Appx." number stamped in the bottom right hand corner.

³ Wayne LaPierre, Wilson Phillips, John Frazer, and Joshua Powell shall be collectively referred to as the "Individual Defendants."

II. The NRA's Unsuccessful Attempts to Interfere with Litigation of the NYAG Enforcement Action in the NY State Court.

7. As of the January 15, 2021 petition date herein ("**Petition Date**"), the NRA had commenced two other federal proceedings and made multiple motions in an effort to avoid litigating the merits of the NYAG Enforcement Action in NY State Court. Those efforts have been rejected by two courts, while a third court considers the NYAG's fully briefed motion to dismiss.

A. The NRA attempts to litigate counterclaims to the NYAG Enforcement Action in the Northern District of New York.

8. On August 6, 2020, hours after the NYAG Enforcement Action was commenced, the NRA filed a countersuit against the NYAG in the United States District Court for the Northern District of New York ("**NDNY Action**").⁴ In the NDNY Action, the NRA asserts claims, *inter alia*, under the First and Fourteenth Amendments arising out of the NYAG's investigation and request for dissolution in the NYAG Enforcement Action. The NYAG's motion to dismiss that federal action was fully briefed as of January 4, 2021.

B. The NRA attempts, and fails, to "remove" the NYAG Enforcement Action through motions to change venue and dismiss.

9. In addition to filing the NDNY Action, the NRA sought to prevent the NYAG Enforcement Action from proceeding in NY State Court with various procedural challenges designed to transfer the NYAG's state law claims to federal court.

10. Six days after the Petition Date, on January 21, 2021, the NY State Court held a hearing on the NRA's motions, and after hearing the arguments of the parties, denied the NRA's requests to dismiss, transfer, or stay the NYAG Enforcement Action in their entirety.⁵ The NY State Court held: "[T]his is an action by New York's Chief Law Enforcement Officer pursuant to

⁴ See *National Rifle Association of America v. Letitia James*, Case No. 20-cv-00889, currently pending before the United States District Court for the Northern District of New York.

⁵ Appendix Exhibit 2 at 235-50, which contains a true and correct copy of the transcript of the hearing held on January 21, 2021 in the NYAG Enforcement Action.

her supervisory authority over a New York not-for-profit corporation for violation of New York law. . . . I'm not aware and the parties have not cited any case applying *forum non conveniens* to move a case from a state court to a federal court in the same state. And that is not what *forum non conveniens* is about.”⁶ The court concluded, “it would be inappropriate, in these circumstances, to find that the Attorney General cannot pursue her claims in state court because one of the defendants would prefer to proceed in federal court.”⁷ Discovery is now proceeding in that action.

C. The NRA attempts, and fails, to move the NYAG Enforcement Action to the United States District Court for the Northern District of Texas through the Judicial Panel on Multidistrict Litigation.

11. On October 20, 2020—a day after the NRA demanded a change of venue in the NYAG Enforcement Action—the NRA filed an application before the Judicial Panel on Multidistrict Litigation (“**JPML**”) to transfer and consolidate four cases in the United States District Court for the Northern District of Texas.⁸ Although the NYAG Enforcement Action was not identified on the schedule of actions the NRA sought to consolidate in Texas (because the NYAG Enforcement Action was pending in state court and thus not subject to immediate consolidation), the NRA’s ultimate intention to move and consolidate the NYAG Enforcement Action into federal court in the Northern District of New York and then in Texas was apparent from its effort to conflate the NYAG Enforcement Action with the NDNY Action by referring to the two action collectively as the “NYAG Litigation.”⁹ By order dated February 4, 2021, the JPML denied the NRA’s application to consolidate, holding in relevant part:

There are just four actions pending in three districts, and proponents have not demonstrated any attempt at informal coordination or transfer via other means before seeking Section 1407 centralization.

⁶ Appendix Exhibit 2 at 244-45.

⁷ Appendix Exhibit 2 at 248.

⁸ See *In Re National Rifle Association Business Expenditures Litigation*, JPML Case No. 2979, Dkt. 5-1 (Amended Schedule of Cases).

⁹ See *id.*, Dkt. Nos. 1-1 and 1-4.

The NRA claims there exist ‘other, related actions that are likely to be removed to federal court.’ But it appears the New York state court enforcement action will remain in state court, as that court recently denied defendants’ motion to dismiss on *forum non conveniens* grounds. The Panel has been ‘disinclined to take into account the mere possibility of future filings in [its] centralization calculus.’¹⁰

12. The JPML also found that while

[t]here may be factual overlap among some of the actions as to particular expenditures by the NRA and its relationship with Ackerman, . . . it appears to be limited and overshadowed by the many individual questions presented by the alleged facts, claims, and parties in each action. . . . In the Northern District of New York action . . . , the NRA alleges the New York Attorney General’s investigation and an underlying New York state court enforcement action constitute retaliation for the NRA’s political advocacy and selective enforcement of New York’s not-for-profit law. That state court action concerns far broader allegations that the NRA is not serving the interests of its members and advancing its charitable mission. It asserts that the NRA was not governed properly, failed to follow state and federal laws, failed to institute an effective compliance program, and filed false regulatory statements.¹¹

III. The NRA’s Bankruptcy Petition to “Primarily” Avoid the NYAG’s Enforcement Action

13. On January 15, 2021, the NRA, along with Sea Girt, filed its voluntary petition for bankruptcy under chapter 11—its third federal proceeding and attempt to avoid litigating the NYAG Enforcement Action in the NY State Court.

14. On the same day that it filed for bankruptcy, the NRA launched a website—NRAForward.org—aimed at educating its members and the general public about the reason the NRA filed for bankruptcy: “The plan can be summed up quite simply: We are DUMPING New York, and we are pursuing plans to reincorporate the NRA in Texas.”¹²

¹⁰ Appendix Exhibit 3 at 273-74, which contains a true and correct copy of the Order Denying Transfer in *In re: National Rifle Association Business Expenditures Litigation*, MDL No. 2979 (Feb. 04, 2021).

¹¹ Appendix Exhibit 3 at 272-73.

¹² See Appendix Exhibit 4 at 276-78, a true and correct copy of the “letter from W. LaPierre to NRA members and supporters dated Jan. 15, 2021, found at <https://www.nraforward.org/waynesletter>.

15. That theme—“dumping” New York—is consistently repeated in the NRA’s public-facing statements.

16. In LaPierre’s letter to NRA members, he stated that the NRA “seek[s] protection from New York officials who illegally abused and weaponized the powers they wield against the NRA and its members.”¹³

17. On a question & answer (“Q&A”) page of the NRAForward.org website, in response to a question about whether the NRA admits that it mismanaged donor funds, comes this answer: “This action is necessitated primarily by one thing: the unhinged and political attack against the NRA by the New York Attorney General.”—that is to say, “primarily” because of the NYAG Enforcement Action.¹⁴

18. In the press release that accompanied the NRA’s petition, the NRA stated that its “plan, which involves utilizing the protection of the bankruptcy court, has the Association dumping New York and organizing its legal and regulatory matters in an efficient forum. The move comes at a time when the NRA is in its strongest financial condition in years.”¹⁵ The press release quotes LaPierre as saying, “Obviously, an important part of this plan is ‘dumping New York.’”¹⁶ It further quotes NRA proposed special counsel, William A. Brewer III, as saying, “Under this plan, the Association wisely seeks protection from New York officials who it believes have illegally weaponized their powers against the NRA and its members.”¹⁷

19. In an interview about the bankruptcy petition, NRA Director Bob Barr stated that the bankruptcy is “a reorganization . . . to protect ourselves and our members from the abuse of

¹³ Appendix Exhibit 4 277-78.

¹⁴ See Appendix Exhibit 6 at 284, a true and correct copy of the “Questions & Answers” page at <https://www.nraforward.org/questionsanswers>.

¹⁵ See Appendix Exhibit 5 at 279, a true and correct copy of the press release dated Jan. 15, 2021 found at <https://www.nraforward.org/press-release>.

¹⁶ Appendix Exhibit 5 at 280.

¹⁷ Appendix Exhibit 5 at 281.

power by New York. It has nothing to do with the NRA's financial posture—which is very strong. . . . It simply is a legal vehicle . . . to escape the abuse by the New York authorities.”¹⁸

20. In an effort to walk back its statements about the reasons it filed for bankruptcy (“casual,” in the words of proposed special counsel for the NRA) the NRA argued in its informational brief that it “is not seeking to escape regulatory oversight.”¹⁹ However, in its description of its plan for reorganization, the NRA represented that it will propose to pay “all of the allowed claims of the NRA's creditors in full and provide[] a mechanism for adjudicating and/or resolving the claims of the [New York Attorney General] and any other creditors with contingent, unliquidated and disputed claims,” making it clear that resolution of the NYAG Enforcement Action is its primary motivation for its petition.²⁰

IV. New York's Regulation of the Dissolution of New York Charities

21. New York's Not-for-Profit Corporation Law (“**N-PCL**”) provides the NYAG and New York courts with broad supervision and gatekeeping authority of all major events in a New York charity's existence, including its merger, consolidation, and dissolution.

22. A New York charity may merge or consolidate with another organization only with the approval of either the New York Supreme Court or the NYAG. N-PCL §§ 907-a, 907-b. If court approval is sought, the NYAG must be provided with notice and an opportunity to object to a charity's proposed plan of merger or consolidation. *Id.* § 907-a(b). Any restricted assets held by the charity designated for use for a charitable purpose will, at the court's discretion, either be transferred with the same conditions to the newly merged or consolidated entity, or transferred to an organization “engaged in substantially similar activit[y].” *Id.* § 907-a(c).

¹⁸ See Newsmax Interview with Bob Barr, <https://www.nraforward.org/news> at time stamp 2:40.

¹⁹ Debtor's Information Brief in Connection With Voluntary Chapter 11 Petitions, Dkt. 31 (“**Informational Brief**”) at ¶26.

²⁰ Informational Brief at 14-15.

23. Similar supervisory and approval authority is given to the NYAG and New York Supreme Court with respect to the dissolution of a New York charity. *Id.* Arts. 10 & 11. Where dissolution is voluntary, the dissolving charity is required to prepare and submit to the NYAG for approval a plan of dissolution that, among other things, plans for the proper distribution of assets held by the charity for a charitable purpose. *Id.* § 1001(d)(3). Whether or not dissolution is voluntary, the New York Supreme Court has the authority to oversee and approve the appropriate distribution of assets held for a charitable purpose by the dissolving entity. *Id.* §§ 1008(a)(15), 1115(a).

ARGUMENT AND AUTHORITY

I. The Debtors' Cases Should be Dismissed for Cause Because They Were Not Filed in Good Faith.

24. By its own admission, the NRA filed its petition in this Court “primarily” because of the NYAG Enforcement Action. Filing a petition for bankruptcy for the primary purpose of seeking a litigation advantage in another forum constitutes bad faith and warrants dismissal. This is particularly true where, as here, the NRA invokes the jurisdiction of the Bankruptcy Court to avoid regulatory oversight.

A. Lack of good faith is a basis for dismissal.

25. Under § 1112(b) of the Bankruptcy Code, on the request of a party in interest, a court shall convert a case to one under Chapter 7 “or dismiss a case . . . whichever is in the best interests of creditors and the estate, for cause unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate.” 11 U.S.C. § 1112(b)(1). While the Bankruptcy Code does not define “cause,” Section 1112(b)(4) provides a non-exhaustive list of examples of “cause” that support dismissal or conversion, including “gross mismanagement of the estate.” 11 U.S.C. § 1112(b)(4).

26. Filing a bankruptcy petition in bad faith is one of the non-enumerated bases for dismissing a case. “Every bankruptcy statute since 1898 has incorporated literally, or by judicial interpretation, a standard of good faith for the commencement, prosecution, and confirmation of bankruptcy proceedings.” *In re Little Creek Dev. Co.*, 779 F. 2d 1068, 1071 (5th Cir. 1986) (citations omitted); *see also In re Humble Place Joint Venture*, 936 F.2d 814, 817 (5th Cir. 1991) (following *Little Creek*).

27. The Fifth Circuit emphasizes “[t]he good faith standard protects the integrity of the bankruptcy courts and prohibits a debtor’s misuse of the process where the overriding motive is to delay creditors without any possible benefit, or to achieve a reprehensible purpose through manipulation of the bankruptcy laws.” *Matter of Elmwood Dev.*, 964 F.2d 508, 510 (5th Cir. 1992). “[G]ood faith implies an honest intent and genuine desire on the part of the petitioner to use the statutory process to effect a plan of reorganization and not merely as a device to serve some sinister or unworthy purpose.” *In re Cedar Shore Resort, Inc.*, 235 F.3d 375, 379 (8th Cir. 2000) (quoting *In re Metropolitan Realty Corp.*, 433 F.2d 676, 678 (5th Cir. 1970)). Importantly, because bankruptcy provides debtors with “powerful equitable weapons,” the Fifth Circuit recognizes the critical gatekeeping function that the good faith standard serves to protect the “jurisdictional integrity of the bankruptcy courts” by limiting its access only to those debtors and creditors “with clean hands.” *Little Creek*, 779 F.2d at 1072.

28. As courts of equity, bankruptcy courts are “enabled to frustrate fraud and work complete justice.” *Pipkins-Thomas v. United States*, 223 Fed. Appx. 310, 313 (5th Cir. 2007) (quoting *Tex. Co. v. Miller*, 165 F.2d 111, 116 (5th Cir. 1947)). To safeguard and prevent abuse, they are empowered with a variety of tools, including Section 105(a)’s broad statutory power and expansive authority to dismiss an action *sua sponte* when filed in bad faith. *See In re Art Midwest*,

Inc., No. 04-91225-RFN-11, 2006 WL 306894, at *3 (Bankr. N.D. Tex. Jan. 5, 2006) (noting the Fifth Circuit in *Little Creek* “instructed bankruptcy courts to be vigilant for those cases where the rehabilitative purposes of chapter 11 will not be served,” in such cases courts are duty bound to dismiss, and holding that even if the parties seeking dismissal had no standing, the court, pursuant to section 105(a) may *sua sponte* dismiss a bankruptcy case filed in bad faith.”) (citation omitted).

29. Courts evaluate the “totality of the circumstances” to determine whether a debtor demonstrates the requisite good faith to access the privileges and equitable powers of bankruptcy. *See, e.g. Cedar Shore*, 235 F.3d at 379 (citing *Little Creek*, 779 F.2d at 1072). The Fifth Circuit instructs bankruptcy courts on how to analyze the facts and circumstances to properly exercise its equitable powers and discretion to protect the bankruptcy system from a debtor’s abuse:

The good faith determination depends largely upon the bankruptcy court's on-the-spot evaluation of the debtor's financial condition, motives, and the local financial realities. A collation of factors, rather than any single datum, controls resolution of this issue. In determining whether a petition was filed with the requisite good faith, the court must examine the facts and circumstances germane to each particular case.

Elmwood Dev., 964 F.2d at 510. Courts make this evaluation by looking objectively at the primary purposes of a debtor’s filing to determine whether it met the requirements of a good faith standard. *See Elmwood Dev.*, 964 F.2d 508, 512 (5th Cir. 1992) (“Because the good faith standard is an objective one, the court was not constrained to entertain and give dispositive weight to testimony as to the subjective state of mind of Elmwood’s manager.”).

30. “In attacking the Debtor's good faith in filing, movant must establish a prima facie case, after which the Debtor has the burden of proving that the petition was filed in good faith.” *In re Sherwood Enterprises, Inc.*, 112 B.R. 165, 170–71 (Bankr. S.D. Tex. 1989). Further, if the debtor intends to rely on an exception to dismissal or conversion provided in § 1112(b)(2), the debtor bears the burden of proving that it satisfies the two elements: First, the debtor must “specifically identify unusual circumstances” establishing that dismissing the bankruptcy case is

not in the best interests of creditors. 11 U.S.C. § 1112(b)(2). Second, the debtor must prove all of the following:

(1) there is a reasonable likelihood that a plan will be confirmed within a reasonable time; (2) the “cause” for dismissal or conversion is something other than a continuing loss or diminution of the estate under § 1112(b)(4)(A); (3) there is reasonable justification or excuse for a debtor’s act or omission; and (4) the act or omission will be cured within a reasonable time.

In re Delta Ag Grp., LLC, 596 B.R. 186, 197 (Bankr. W.D. La. 2019)(citing 11 U.S.C. §§ 1112 (b)(2)(A)-(B)).

B. The Debtors’ cases were filed to obtain a litigation advantage.

31. Dismissal of a bankruptcy petition for lack of good faith is warranted where “the purpose of the petition was not primarily to reorganize or respond to financial crisis but instead was to gain unfair advantage” in litigation. *In re Antelope Techs., Inc.*, 431 Fed. Appx. 272, 275 (5th Cir. 2011) (affirming dismissal of petition that was “filed to gain an advantage in . . . shareholder litigation rather than for reorganization”). While “[m]erely obtaining a litigation advantage by pursuing bankruptcy is not dispositive of bad faith, . . . when a bankruptcy court finds a party pursues bankruptcy for the purpose of securing litigation advantage in another forum, such intent is dispositive: it establishes bad faith and necessitates dismissal.” *Investors Group, LLC v. Pottorff*, 518 B.R. 380, 384 (N.D. Tex. 2014) (internal quotation marks and citation omitted). In so holding, the Fifth Circuit has joined courts across the country in holding that “it constitutes bad faith to file bankruptcy to impede, delay, forum shop, or obtain a tactical advantage regarding litigation ongoing in [a] nonbankruptcy forum—whether that nonbankruptcy forum is a state court or a federal district court.” *In re Silberkaus*, 253 B.R. 890, 905 (Bankr. C.D. Cal. 2000) (holding that debtor filed petition to delay pending state court specific performance litigation and to have that litigation decided in bankruptcy court) (collecting cases), *aff’d*, 336 F.3d 864 (9th Cir. 2003).

32. When considering whether a bankruptcy petition was filed as a litigation tactic, courts look to the timing of the petition and the surrounding circumstances. Thus, in *Investors Group*, the court was persuaded that the debtor had filed in bad faith because (1) the debtor was not under any immediate financial pressure when it filed its petition and (2) “[w]hat pressured [the debtor] was the impending state court litigation.” 518 B.R. at 384.

33. Particularly persuasive and analogous to the facts before this Court is the Third Circuit’s decision in *In re SGL Carbon Corp.*, 200 F.3d 154 (3d Cir. 1999). *See also In re Mirant*, No. 03-46590, 2005 WL 2148362, at *5 (Bankr. N.D. Tex. Jan. 26, 2005) (collecting cases including *In re SGL* and *Little Creek* for the proposition that “many courts have held that lack of good faith is appropriate cause for dismissal under” § 1112(b)). In *SGL*, the debtor publicly stated that it was filing for bankruptcy to gain a tactical advantage over plaintiffs in antitrust lawsuits filed against the debtor, in an effort to “change the negotiating platform” with those plaintiffs. 200 F.3d at 158. The debtor had said that it was otherwise financially healthy and did not present any evidence that a judgment in the antitrust lawsuit would result in it going out of business. *Id.* at 162-63. Furthermore, the debtor’s proposed plan of reorganization had it paying all its creditors in full except for judgment creditors in the antitrust lawsuits, who “would be required to accept limited-time credits to purchase [debtor’s] products.” *Id.* at 167. The Third Circuit held that filing “merely to obtain tactical litigation advantages is not within the legitimate scope of the bankruptcy laws[.]” *Id.* at 165 (internal quotation marks omitted). Observing that “[c]ourts . . . have consistently dismissed Chapter 11 petitions filed by financially healthy companies with no need to reorganize under the protection of Chapter 11,” the *SGL* court dismissed the debtor’s petition for lack of “a valid reorganizational purpose.” *Id.* at 166-69.

34. Here, the NRA announced to its members and the public that it was filing for bankruptcy not just to gain a tactical litigation advantage but “primarily” to evade regulatory enforcement by the NYAG.²¹ It declared its intention to use this Court to “DUMP[] New York,”²² and its petition as a “legal vehicle . . . to escape the abuse by the New York authorities.”²³ This bad faith filing should not be permitted.

35. Further, the NRA’s petition in this Court is the latest in its series of unsuccessful attempts to impede or evade litigation of the merits of the NYAG Enforcement Action in the NY State Court. First, it filed a countersuit in federal court in the Northern District of New York; second, the NRA unsuccessfully attempted to “remove” the NYAG Enforcement Action through motions to change venue or dismiss in NYAG Enforcement Action; and third, the NRA filed an application before the JPML to transfer and consolidate the NDNY Action and NYAG Enforcement Action in federal court in Texas. The bankruptcy petition and this Court is just the most recent venue in a list of forums the NRA has been shopping for approximately six months.

36. At the same time, the NRA maintains that, as of the Petition Date, its “total net assets are approximately \$50 million.”²⁴ Indeed, the NRA claims that “[t]he [petition] comes at a time when the NRA is in its strongest financial condition in years.”²⁵ As in *SGL*, the NRA’s purpose for filing this petition was to “change the negotiating platform” with the NYAG. *See* 200 F.3d at 158. And, without presenting any evidence of financial distress that warrant the filing of this petition, the NRA is using this Court “merely to obtain tactical litigation advantages.” *Id.* at 165.

²¹ Appendix Exhibit 6 at 284.

²² Appendix Exhibit 4 at 276-78.

²³ Newsmax interview with Bob Barr, <https://www.nraforward.org/news> (at time stamp 2:40).

²⁴ Informational Brief at ¶ 10.

²⁵ *See* Appendix Exhibit 5 at 279.

37. Any claim of contingent insolvency the NRA may make based on the pending litigation against it would not save its petition. In *SGL*, the Third Circuit held that the pending antitrust litigation against the debtor “did not pose a sufficient *present* threat to justify bankruptcy relief.” *In re Liberate Techs.*, 314 B.R. 206, 212 (Bankr. N.D. Cal. 2004) (summarizing *SGL*, and similarly holding that the debtor faced a limited number of lawsuits with indeterminate outcomes such that its bankruptcy petition was not warranted). Furthermore, “[b]ecause the lawsuits were contested and had not yet been tried, debtor might never suffer any such liability.” *Id.* Here, the outcome of the various litigations the NRA is involved in are indeterminate. No judgment has been entered against the NRA; no trials have begun, let alone verdicts rendered. The NRA’s bankruptcy petition is at best premature.²⁶ Furthermore, several of the NYAG’s claims in the NYAG Enforcement Action would, if successful, result in a benefit to the NRA, including the NYAG’s claims for restitution and recovery of unauthorized compensation directed at the individual defendants in that action.²⁷

38. For the foregoing reasons, the Attorney General requests that the Court dismiss the NRA’s petition for being filed absent the requisite good faith.

II. Alternatively, the Court Should Appoint a Chapter 11 Trustee.

39. If the Court does not dismiss the petitions as filed in bad faith, it is respectfully submitted that it should alternatively appoint a Chapter 11 trustee pursuant to 11 U.S.C. § 1104.

²⁶ To the extent that the NRA hinted at the first day hearing that it has filed for bankruptcy to consolidate pending lawsuits, it publicly states otherwise and has failed to set forth the groundwork for the same. Thus far the NRA has only identified sixteen (16) pending lawsuits, in connection with its application for approval of special counsel. Dkt. 84-2. But ten of those cases were commenced by the NRA. A number have been consolidated for litigation. Further, one proceeding has been dismissed with no opportunity for appeal (the JPML application), another is on appeal (*NRA v. Cuomo*, 20-cv-385 (N.D.N.Y.) (a suit challenging COVID-related restrictions)), and another has been stayed pending the outcome of the NYAG Enforcement Action (*NRA v. North*, Index No. 903843-20 (Sup. Ct. Albany Cnty.)). Moreover, the NRA already argued that it should be permitted to consolidate litigation and the JPML denied its application, finding a lack of sufficient relationship between the lawsuits. Appendix Exhibit 3 at 272-74.

²⁷ See Appendix Exhibit 1 at 147-165 (Counts Three through Thirteen and Eighteen).

Appointment of a trustee is appropriate where, as here, there is evidence of fraud, dishonesty, incompetence and mismanagement by the debtor's current leadership. Further, there is significant evidence that appointment of a trustee would be in the interests of the NRA's creditors and the estate.

40. Courts will leave a debtor in possession in place only where current management "can be depended upon to carry out the fiduciary responsibilities of a trustee." *See Commodity Futures Trading Comm'n v. Weintraub*, 471 U.S. 343, 355 (1985) (quoting *Wolf v. Weinstein*, 372 U.S. 633, 651 (1963)). Where management is incapable of performing these duties, or where the confidence of creditors evaporates, a Chapter 11 trustee must be appointed. *See In re Marvel Entm't Group, Inc.* 140 F.3d 463, 473 (3d Cir. 1998).

41. Appointment of a Chapter 11 trustee is an extraordinary remedy and accordingly there is a presumption in favor of allowing the debtor to remain in possession. *See, e.g., In re 1031 Tax Group, LLC*, 374 B.R. 78, 85 (Bankr. S.D.N.Y. 2007) (citing *In re Euro-American Lodging Corp.*, 365 B.R. 421, 426 (Bankr. S.D.N.Y. 2007)); *In re Sharon Steel Corp.*, 871 F.2d 1217, 1225-26 (3d Cir. 1989); *In re Evans*, 48 B.R. 46, 47 (Bankr. W.D. Tex. 1985).

42. The party seeking appointment of a trustee must prove its case by a clear and convincing standard based upon the particular facts before the court. *See In re Cajun Elec. Power Co-op, Inc.*, 69 F.3d 746, 750 (5th Cir. 1995), *withdrawn in part on reh'g*, 74 F.3d 599 (5th Cir. 1996) (adopting earlier dissent's reasoning on conflicts constituting sufficient cause to appoint trustee), *cert. denied*, 519 U.S. 808 (1996); *In re Patman Drilling Int'l, Inc.*, Case No. 07-34622-SGJ, 2008 WL 724086 (Bankr. N.D. Tex. 2008).

43. However, “[i]f a court finds that the moving party has discharged this burden, it ‘shall’ appoint a trustee.” *In re G-I Holdings, Inc.*, 385 F.3d 313, 318 (3d Cir. 2004) (citing 11 U.S.C. § 1104(a)(1)); *see also Marvel*, 140 F.3d at 471; *Sharon Steel*, 871 F.2d at 1225-26.

A. Cause exists to appoint a Chapter 11 trustee under 11 U.S.C. § 1104(a)(1).

44. Section 1104(a)(1) provides that “on request of a party in interest or the United States Trustee...the court *shall* order the appointment of a trustee...for cause, including fraud, dishonesty, incompetence, or gross mismanagement of the affairs of the debtor by current management, either *before* or after the commencement of the case[.]” 11 U.S.C. § 1104(a)(1) (emphasis added). The categories enumerated in Section 1104(a)(1) are illustrative and not exclusive. *See Marvel*, 140 F.3d at 472.

45. There is cause for appointment of a trustee under § 1104(a)(1) due to the ample evidence of fraud, dishonesty, incompetency and gross mismanagement of the NRA’s affairs. Allegations of such misconduct are set out at length in the 163-page NYAG Enforcement Complaint.²⁸ Those allegations are the result of a more than year-long investigation which yielded proof of such misconduct from admissions in sworn testimony from current and former NRA officers and directors, the NRA’s business records, and the NRA’s regulatory filings. Indeed, the NRA confirmed certain of the NYAG’s investigatory findings in regulatory disclosures made in November 2020, after the NYAG commenced the NYAG Enforcement Action. The NYAG Enforcement Complaint sets out allegations of pervasive and persistent violations of New York laws governing charitable not-for-profit entities, only a sample of which constitute cause for appointment of a trustee. Representative examples of such misconduct, as described below, provide sufficient cause for appointment of a trustee.

²⁸ Appendix pp. 1-169.

i. Management's use of the NRA's charitable assets to benefit themselves and other insiders constitutes the type of fraud, dishonesty, and gross mismanagement that suffice as cause to appoint a trustee.

46. “Diversion of funds and misuse of corporate assets constitutes fraud or dishonesty sufficient to warrant appointment of a trustee under section 1104(a)(1).” *In re PRS Insurance Group, Inc.*, 274 B.R. 381, 385 (Bankr. D. Del. 2001); *see also In re Professional Accountants Referral Svcs., Inc.*, 142 B.R. 424, 428-29 (Bankr. D. Color. 1992) (diversion of corporate assets for personal use constitutes dishonesty or gross mismanagement which required the appointment of a trustee); *In re Bibo, Inc.*, 76 F.3d 256, 257 (9th Cir. 1996) (court had “ample basis” for appointing a trustee where management had siphoned funds from the debtor through kickbacks); *Sharon Steel*, 871 F.2d at 1228 (systemic syphoning of debtor’s assets to other companies under shareholder’s common control constituted cause for appoint of trustee).

47. The NYAG Enforcement Complaint is replete with examples of LaPierre’s and his lieutenants’ siphoning of tens of millions of dollars out of the NRA to use for their own purposes while failing to disclose such payments on regulatory filings and blatantly violating the NRA’s reimbursement, procurement, and expense policies.²⁹

48. As one example of this type of conduct, the NRA has incurred substantial costs paying for LaPierre’s private air travel and the private air travel of his family for non-business purposes and in violation of NRA policies and practices. Charging personal expenses, including travel expenses, to a business has been found to constitute gross mismanagement.

49. From May 2015 to April 2019 (the most recent date for which the NYAG has such NRA records), the NRA incurred over \$1 million in expenses for private flights when LaPierre was not a passenger. For example, in February 2018, LaPierre authorized a private flight for an

²⁹ See Appendix Exhibit 1 at 39-76.

NRA spokesperson, her husband, and an Ackerman employee from Dallas, TX to Fort Lauderdale, FL and Washington D.C. These flights cost \$107,775.

50. In addition, the NRA incurred costs for private chartered jets for travel by LaPierre's family that lacked a reasonable business purpose or do not appear to have been approved by the NRA Board. Some instances include:

- a. In August 2016, LaPierre authorized a private flight for his niece and her husband to fly from Dallas, TX, to their home in North Platte, NE at the cost of almost \$12,000.
- b. In October 2016, LaPierre authorized a private flight for his wife to fly alone from Madison, WI, to Kearney, NE, near his niece's home, at a cost of more than \$8,800.
- c. In January 2017, LaPierre authorized a private jet to pick up his niece's husband in Nebraska, on the way to Las Vegas for a Safari Club convention in order "to help babysit" while LaPierre's niece worked "because there was nobody else to do it." LaPierre also authorized a private flight to fly his niece's husband back to Nebraska two days before his niece returned at a cost of about \$15,000.
- d. In July 2017, LaPierre authorized a private flight for his niece and her daughter to fly from Dallas, TX, to Orlando, FL, testifying "She had tried to travel commercial. All the commercial flights they had – there was a mechanical problem." The cost of the flight was more than \$26,995.
- e. In November 2018, LaPierre and his wife took a private roundtrip flight from Washington D.C. to Dallas, TX, and stopped in North Platte, NE, on each leg of the trip to pick up and drop off LaPierre's niece and grandniece. These flights cost \$59,790.
- f. LaPierre and his family took NRA-funded private flights to and from the Bahamas, often stopping in Nebraska on each leg of the trip to pick up and drop off his niece and her family. The NRA paid over half a million dollars for each of these flights.

51. The NRA's former Chief Financial Officer ("**CFO**") Craig Spray³⁰ testified that, in the fall of 2018, as one of his efforts to cut spending, the NRA eliminated "all non-mission-critical

³⁰ Craig Spray was hired first as the NRA's CFO in 2018 and subsequently appointed as Treasurer by the Board. He was re-appointed at the October 2020 NRA Annual Board Meeting. However, upon information and belief, Mr. Spray

travel” to reduce the NRA’s expenses. But NRA records establish that it continued to pay for private flights with no apparent business purpose. For example, in March 2019, LaPierre and his wife Susan took a private flight from Washington D.C. to Orlando, FL, and stopped in North Platte, NE, on the way back to drop off his niece and grandniece. These flights cost \$78,900. In April 2019, LaPierre and his wife took a private flight from Washington D.C. to Tulsa, OK, making additional stops in Omaha and North Platte, NE. These flights cost \$49,535. When presented with an invoice showing that LaPierre, his wife, his niece, and his grand-niece travelled in 2019 by charter plane to/from Washington, D.C.; Orlando, FL; and North Platte, NE, for approximately \$71,000, the NRA’s former CFO testified that he did not know what business purpose would be served by private flights to or from North Platte, NE.

52. In fact, the former NRA CFO learned for the first time that LaPierre’s wife travels by private charter alone at the NRA’s expense when counsel informed him the night before he was examined by the NYAG in June 2020.

53. These and other personal travel expenses were not properly reported on the NRA’s required regulatory disclosures. In its annual filings with the NYAG for 2014 to 2018, the NRA inaccurately asserted that it required substantiation prior to reimbursing these expenses. But in its IRS Form 990 for 2019 (publicly filed in November 2020 *after* the NYAG Enforcement Action alleged flagrant disregard by NRA senior executives of the NRA’s travel and other expense reimbursement policies) the NRA reversed itself and admitted that it did not require substantiation of a business purpose for private flights billed to the NRA prior to payment or reimbursement.

54. NRA funds were also used to pay for an expensive private travel consultant for LaPierre. From August 2014 to January 2020, the NRA paid LaPierre’s personal travel consultant

resigned since the filing of the bankruptcy petitions. Counsel for the NRA informed the Court at a hearing on February 10, 2021 that Sonya Rowling, an NRA employee, now holds the position of CFO.

more than \$13.5 million. For almost the entirety of this time, the consultant worked without a contract, without having been subject to competitive bidding and without Board approval. Once the travel consultant's contract was finally subject to competitive bidding, the price of the services dropped to a fraction of what they had been before.

55. These examples relate not only to LaPierre's abuse of private travel but serve to demonstrate how the lack of oversight, minimal governance, and absence of honest reporting resulted in waste of charitable resources.

56. Following commencement of the NYAG Enforcement Action in August 2020, the NRA finally acknowledged that it improperly paid for LaPierre's personal travel expenses, and only disputes the amount of those payments. For example, in its 2019 IRS Form 990, the NRA admitted (for the first time) to paying LaPierre approximately \$300,000 in travel-related excess benefits.³¹

57. In the same filing, the NRA reported paying two former senior executives more than \$1 million in excess benefits over a five-year period, including for personal travel, club, and meal expenses.³² None of those benefits were timely reported in the NRA's annual IRS Form 990 and CHAR500 filings as required under federal and New York law. The NRA also reported (again for the first time) that other NRA executives and board members may have used first or business class travel without authorization in violation of the NRA's travel policy, but that it was currently "unable to estimate the amount of excess costs incurred."³³

³¹ See Appendix Exhibit 8 at 444, which contains a true and correct copy of the NRA's IRS Form 990 for 2019. The NYAG disputes this figure as insufficient to cover improper travel expenses and other personal expenses paid by the NRA but notes that throughout its 2019 IRS Form 990 filing, the NRA admits that it made improper payments and failed to disclose the same in earlier filings. The NRA has not stated that it is going to correct its earlier filings, perform a full investigation or seek to recoup all such monies wrongly paid.

³² Appendix Exhibit 8 at 443 (reporting payments to Executive Director Chris Cox of more than \$1 million in excess benefits, and to former Deputy Executive Director David Lehman for "personal travel, club, and meal expenses in the aggregate amount of at least \$87,595.83").

³³ See Appendix Exhibit 8 at 444.

58. This is in accord with LaPierre's consistent failure to implement, follow, and ensure compliance with NRA policy. At LaPierre's instigation, for example, between 2013 and 2017, LaPierre was reimbursed for more than \$1.2 million in expenses.³⁴ These reimbursements include over \$65,000 just for Christmas gifts from LaPierre. Each of the covered gifts far exceeded the \$25 limit permitted under federal regulations and should have been reported as W-2 income to LaPierre.³⁵

59. Nor are LaPierre's reimbursements limited to Christmas gifts. They include NRA payments on items as varied as \$800 mosquito control treatments outside his home for "security purposes"; baby shower gifts for his executive assistant's daughter-in-law for \$237.04; a \$1,260 hostess gift for the wife of a vendor; glass sculptures for Susan LaPierre's executive assistant for \$381.60; and membership and participation fees for Susan LaPierre for the Shikar Safari Club International, which cost thousands of dollars annually.

60. LaPierre has also routinely expensed his niece's lodging and airfare for events that were allegedly related to NRA business. As an NRA employee, LaPierre's niece was required to follow NRA policies and procedures for seeking approval and reimbursement for her work-related expenses and limits on such costs. Instead, LaPierre submitted reimbursement requests for his niece's travel expenses on numerous occasions. For example, in early 2017, LaPierre expensed \$6,561.90 for his niece's 5-night stay at the Beverly Hills Hotel in Beverly Hills, CA. The nightly rate for the room was \$1,075. From 2015 to 2017, LaPierre was reimbursed tens of thousands of dollars in expenses for his niece's airfare and lodging.

61. LaPierre and other officers and directors also engaged in improper related party and conflict of interest transactions to benefit themselves, their families and other insiders. The NYAG

³⁴ Appendix Exhibit 1 at 51, ¶ 190.

³⁵ See, e.g., 26 U.S.C. § 274(b); see also IRS Publication 463 Travel, Gift, and Car Expenses.

Enforcement Complaint has numerous examples of such transactions but a few are set forth to illustrate the lack of honesty, care and consideration of fiduciary duties by NRA executives and board members that warrants appointment of a trustee.

62. During LaPierre's trips to the Bahamas, he often utilized a 108-foot yacht owned by one of the NRA's large vendors. The yacht, named *Illusions*, is equipped with four staterooms, a 16-foot jet boat, and two jet skis. LaPierre testified that neither he nor the NRA paid for the use of *Illusions*. LaPierre also used *Illusions* for Mediterranean vacations.³⁶



63. LaPierre has never disclosed his use of the *Illusions* yacht on the NRA Financial Disclosure Questionnaires that he, as an officer and *ex officio* director of the NRA, must submit to the NRA Secretary annually. Question 4 of the questionnaire asks:

Have you or any relative received, or do you or any relative expect to receive, any gift, gratuity, personal favor, or entertainment with either a retail price of fair market value in excess of \$250 from any person or entity that has or is seeking to have a business relationship with, or received funds from, NRA or any NRA Entity?

³⁶ Image taken from <https://www.yachtcharterfleet.com/luxury-charter-yacht-36386/illusions.htm>, last accessed February 10, 2021.

LaPierre answered no to this question in every questionnaire he submitted from 2008 to 2018 (the most recent questionnaire produced by the NRA to the OAG). Despite receiving luxury yacht vacations courtesy of a top NRA vendor, LaPierre similarly testified that he has never received a gift of value in excess of \$250 from an NRA contractor or employee of an NRA contractor. Entities affiliated with this vendor were paid in excess of \$100 million by the NRA between 2014 and 2019.

64. LaPierre has also directed or overseen the diversion of NRA funds for purposes unrelated to the organization's mission. For example, between 2015 and 2018, the NRA paid \$450,000 to a charity for which Susan LaPierre was a board member. That figure excludes amounts paid indirectly to the charity by being billed through NRA vendors. That charity's mission had no overlap with the NRA's charitable mission. In 2019, the NRA Audit Committee retroactively found that the \$450,000 in direct payments to the charity were "fair, reasonable, and in the best interest of the NRA," but it failed to assess how donating such funds advanced the NRA's charitable purposes or the propriety of the other benefits LaPierre indirectly funneled to the charity.

65. While the NRA is currently engaged in litigation with Ackerman McQueen in which it has accused Ackerman of improper invoicing and billing, the two had a close business relationship for three decades. The NRA's management, including LaPierre, negotiated and approved contracts with Ackerman, paying the public relations and advertising firm up to \$42,682,439.97 per year. LaPierre admitted knowing that expenses were being passed through Ackerman. He further testified that prior to 2018, it was his understanding that *once per year*, former NRA Treasurer and CFO Wilson "Woody" Phillips would travel to Ackerman McQueen's headquarters to "look at their receipts" and he "just assumed as treasurer, [Phillips] was doing what he was supposed to." It was the NRA's obligation to ensure compliance with laws applicable to

not-for-profit entities and its pass through of expenses and oversight of payments clearly demonstrate, at a minimum, gross mismanagement and an almost total lack of oversight.

66. The Brewer firm's retention and billing weigh in favor of the appointment of a trustee, serving as evidence of the gross mismanagement of the affairs of the NRA by current management. In retaining and determining the scope of work for the Brewer firm, LaPierre and the NRA failed to follow basic retention procedure. Most critically, LaPierre did not seek alternative bids to perform the work, review the financial terms of the firm's engagement, or undertake any consideration of project-based pricing as an alternative to hourly-based pricing.³⁷ Instead, the process of negotiating the engagement letter and the pricing, and reviewing and approving the firm's invoices, was left entirely to General Counsel John Frazer, despite the fact that he possessed little, if any, relevant experience. When he negotiated the original engagement letter with the Brewer firm, Frazer did not comply with the NRA's internal controls and policies by failing to obtain the requisite written approval from the NRA President and one Vice President.

67. Over the course of the engagement itself, the Brewer firm has charged—and caused the NRA to incur—exorbitant legal fees. More specifically, according to NRA regulatory disclosures, the NRA has authorized and expended significant institutional funds—in excess of \$38,621,386 million between March 2018 and December 2019—for payments to the Brewer firm. Upon information and belief that figure excludes billing for much of 2020 and does not include the \$794,582.50 for services that solely “relate to the chapter 11 filings” in these bankruptcy cases.³⁸ That fee has been fully paid. In addition, the Brewer firm was paid a \$2,551,039.54 retainer for anticipated work as special counsel in connection with this bankruptcy.³⁹

³⁷ The Brewer firm's involvement here raises the specter of potential conflicts as well. The firm represented Wayne LaPierre in the course of the Attorney General's investigation.

³⁸ See Dkt. 84-5.

³⁹ See Dkt. 84-5.

ii. The NRA's consistent practice of filing false and misleading regulatory filings constitutes cause to appoint a trustee.

68. As a New York not-for-profit corporation holding charitable assets and operating in New York, the NRA must register and file accurate and complete annual reports with the Charities Bureau of the Office of the Attorney General. *See* N.Y. EPTL §§ 8-1.4(d) and (f). In addition to these registration requirements, as a charitable organization soliciting contributions in New York, the NRA must also register and file accurate and complete annual reports under Article 7-A of the Executive Law. N.Y. Exec. § 172-b. These annual reports, commonly referred to as CHAR500s, must include copies of an organization's annual IRS Form 990, and, for organizations like the NRA, copies of the organization's audited financial statements. *Id.* Further, the CHAR500s must be signed by: (i) the organization's President or Authorized Officer and (ii) its Chief Financial Officer or Treasurer, both of whom, by their signatures, certify under penalties of perjury that the report, including all attachments, is true and accurate. *See id.* New York law expressly provides that no person shall "[m]ake any material statement which is untrue in...[a] financial report or any other form or documents required to be filed" with the Attorney General's office pursuant to Article 7-A of the Executive Law. *See* N.Y. Exec. § 172-d(1).

69. The NRA made materially false and misleading statements and omissions in its 2015, 2016, 2017, and 2018 CHAR500 filings with the Attorney General.⁴⁰ These statements included, but were not limited to, false statements about compensation and benefits for officers and directors, false statements about diversion of corporate assets, false statements about enforcement of its conflict of interest policy, false statements about its process for determining

⁴⁰ The NRA's 2019 IRS Form 990 was filed in November 2020. On its face, that form raises substantial questions about its accuracy and completeness. For example, the NRA admits on the form that it has "identified what it believes are excess benefit transactions in which it engaged in 2019 and in prior calendar years of which it became aware but were not reported in its prior forms 990." Appendix Exhibit 8 at 443. The NRA further indicated that these unspecified transactions were "still under review" and the NRA was unable at the time of filing to say whether the transactions constituted excess benefit transactions. *Id.*

compensation of officers, false statements about compensation and benefits of directors, false statements about compensation policies and reviews, and false statements about transactions with interested persons.⁴¹ The NYAG Enforcement Complaint contains examples of false and misleading statements the NRA has filed in contravention of its obligations under New York Law during the period 2015-2018.⁴² The NRA's consistent dishonesty in its regulatory filings constitutes cause to appoint a trustee.

70. By way of example, for years, under the control of LaPierre, Frazer and other NRA officers and directors instituted a practice whereby millions of dollars in entertainment and travel expenses incurred by NRA executives were billed to the NRA as disbursements by the NRA's largest vendor, Ackerman McQueen. This evaded both the NRA's own accounting and IRS requirements for expense reimbursement and reporting.

71. LaPierre and other insiders regularly used this Ackerman McQueen pass-through arrangement to conceal private travel and other costs that were largely personal in nature, wasting substantial charitable resources and exposing the NRA to potential liability for violation of IRS reporting requirements. In its mandated filings, such as in 2018, the NRA indicated that it required substantiation of all expenses prior to reimbursing or paying for expenses incurred by all directors, trustees and officers. But in its most recent filing, the 2019 IRS Form 990, filed in November 2020, the NRA disclosed that in fact it did not require substantiation prior to reimbursing or allowing expenses incurred by all directors, trustees, and officers, including the CEO/Executive Director.⁴³

72. Misuse of NRA funds has continued even after the NRA was aware of the NYAG's investigation in April 2019. After the NYAG confronted the then-CFO with evidence relating to

⁴¹ See Appendix Exhibit 1 at 136-40.

⁴² See Appendix Exhibit 1 at 136-40.

⁴³ See Appendix Exhibit 8 at 434 (2019 Form 990, Schedule J, Part 1, Line 2).

the falseness of the NRA's previous filings, in its filing in November 2020, the NRA was forced to admit that it did not follow its written policy regarding payment or reimbursement for expenses including tax indemnification and gross-up payments, housing allowance or residence for personal use, and health or social club dues or initiation fees.

73. In its November 2020 filing, the NRA further admitted that it engaged in excess benefit transactions with disqualified persons (of the kind alleged in the NYAG Enforcement Action) that had not been disclosed in earlier IRS filings, as required by law.⁴⁴ An excess benefit transaction is a transaction in which an economic benefit is provided by a not-for-profit entity, directly or indirectly, to a "disqualified person," and the value of the economic benefit provided by the organization exceeds the value of the consideration received by the organization. 26 CFR § 53.4958-4. A disqualified person is a person "in a position to exercise substantial influence over the affairs" of the not for profit. *Id.* § 53.4958-3 (citing 26 U.S.C. 4958(f)(1)(A)). In its 2019 IRS Form 990, the NRA further admits that has it has engaged in what it believes are excess benefit transactions in 2019 and earlier years, some of which were not reported in prior Form 990s.⁴⁵

74. These failures demonstrate dishonesty, fraud, and/or gross incompetence which could subject the NRA to sanctions, fines and tax exposure and are cause for appointment of a trustee. *See, e.g., Evans*, 48 B.R. at 47-49 (appointing Chapter 11 trustee where debtor in possession provided no excuse for failing to file tax returns, subjecting estate to possible interest and penalties, and failed to investigate potential preferential transfers).

⁴⁴ See Appendix Exhibit 8 at 398 (2019 Form 990, Part IV, quest 25(a) and (b)).

⁴⁵ See Appendix Exhibit 8 at 443-44 (Schedule L).

iii. The NRA General Counsel's lack of oversight constitutes cause to appoint a trustee.

75. As a New York not-for-profit corporation exempt under the Internal Revenue Code § 501(c)(4), the NRA is a charity subject to the authority of the New York Attorney General. *See Citizens United v. Schneiderman*, 882 F.3d 374 (2d Cir. 2018). The NRA's use of its assets and institutional funds, its governance and operations, and the fiduciary duties of its officers and directors, are governed by the N-PCL and Estates Powers & Trusts Law ("**EPTL**"). The NRA's fundraising activities are governed by the Executive Law.

76. Under New York law, the NRA's Board was required to adopt, implement and assure compliance with a conflict of interest policy that ensures the NRA's trustees, directors, officers and key persons act in the corporation's best interest and comply with legal requirements, including those concerning related party transactions. *See* N-PCL § 715-a; EPTL § 8-1.9. Likewise, the NRA and its Board of Directors were legally required to adopt, oversee and ensure compliance with a policy providing for an effective process to receive and consider whistleblower concerns and for protecting whistleblowers. *See* N-PCL § 715-b; EPTL § 8-1.9.

77. In his capacity as Secretary and General Counsel, Frazer had the duty to be aware of these legal requirements and assure that appropriate changes were timely made in the NRA's governance procedures to comply with these requirements. From 2014 to 2018, Frazer failed to make the necessary changes to board governance procedures, or to advise officers and directors of the needed changes. He failed to ensure that related party transactions were being appropriately addressed in accordance with N-PCL § 715; failed to enforce compliance with the NRA's Conflict of Interest Policy for years; and failed to ensure that the NRA was in compliance with laws and policies governing whistleblowers.

iv. The NRA Board failed to appropriately review and approve lucrative contracts with insiders.

78. The NRA's lack of oversight resulted in the waste of millions of dollars in charitable assets. One example is in the awarding of lucrative contracts to insiders and entities providing personal benefits to the LaPierres without proper review and authorization of such transactions by the NRA Board. In some instances, such contracts have constituted related party transactions that the Board was required to approve upon contemporaneous proof that the transaction was fair, reasonable and in the corporation's best interest at the time of such determination. N-PCL § 715. Further, the NRA Board was required to adopt and ensure compliance with a conflict of interest policy to ensure that its directors, officers and key persons act in the corporation's best interest and comply with applicable legal requirements. N-PCL § 715-a. The Board failed to carry out these duties in many ways, including in regard to overseeing lucrative contracts to current and former NRA officers and employees and other insiders.

79. Pursuant to the NRA Bylaws, the compensation of the executive vice president, the general counsel and the treasurer are set by the Board. These officers are not permitted to receive any compensation without specific Board authorization. Further, compensation must be accurately disclosed on regulatory filings. In addition, contracts above \$100,000 in total payments require certain authorizations. Yet the NRA has awarded rich post-employment "consulting" contracts to its senior officers with little to no oversight or compliance with internal policies and without any real assessment of benefits to the NRA.

80. As one instance of this conduct, LaPierre himself had a post-employment contract which provided for payments in excess of \$1 million per year after his tenure as executive vice president ends due to retirement or losing a re-election bid. Originally signed in 2013, the contract was not properly ratified, reviewed, or reported to the Board or the government on regulatory

filings. The contract was amended a number of times. In each amendment, the duration and compensation provided in the contract increased. The NRA was obligated to continue to pay LaPierre for years after he lost re-election or retired and at a higher rate than his compensation as executive vice president. Pursuant to the April 30, 2018 amendment (the last amendment provided to the AG in its investigation), the contract provided for a 7-year compensation schedule paying \$1,300,000 in 2019, and \$1,500,000 for the next 6 years (2020-2025) with an additional five years (2026-2030) at similar rates.

81. As another example, the NRA's former longtime treasurer and CFO, Wilson Phillips, before retiring, was awarded an independent consulting agreement under which he would be paid \$30,000 per month for five years after his retirement, for unspecified consulting services, with no deliverables. This contract was signed by the then NRA President and First Vice President.⁴⁶ Carolyn Meadows was the First Vice President at that time; she is now NRA President. There is no evidence that the contract was properly reviewed or approved in conformance with NRA Bylaws and policies. The Chair of the Audit Committee testified that if the contract constituted a related party transaction and had been presented to the Audit Committee, "I can guarantee you my committee would not have approved that."

82. In another instance, when the NRA terminated its former executive director of general operations, LaPierre directed the NRA to agree to pay the terminated officer for "consulting services" totaling approximately \$1.8 million. This contract was not subject to competitive bidding, internal review or required approvals. Nor, upon information and belief, were services rendered under the contract, although the contract was paid.

⁴⁶ Ms. Meadows is part of the NRA Special Litigation Committee that LaPierre consulted to commence this bankruptcy case. *See* Dkt. 1.

83. Such contracts are self-dealing, demonstrate a lack of compliance with internal policies and a lack of meaningful oversight, and constitute a waste of charitable assets. Yet these and similar contracts were not reviewed or approved appropriately or were retroactively approved without the required thorough analysis.⁴⁷

v. The NRA also failed to properly implement required policies for whistleblower complaints.

84. Under New York law, an organization of the NRA's size must "adopt, and oversee the implementation of, and compliance with, a whistleblower policy to protect from retaliation persons who report suspected improper conduct." N-PCL § 715-b. The NRA failed in this obligation as well, stifling internal reform efforts.

85. For example, in July 2018, a group of senior level staff in the Office of the Treasurer acted as whistleblowers when they created a "List of Top Concerns for the Audit Committee" which enumerated their concerns relating to financial conflicts of interest, senior management override of internal controls, and vague and deceptive billing practices. On July 30, 2018, the Audit Committee held an emergency meeting at which the concerns were presented. The Report of the Audit Committee documenting the July 30, 2018 meeting makes no mention of the fact that whistleblowers came forward. In contrast, it was the usual practice of the Audit Committee to expressly note in its committee reports when "there were no instances of whistleblowing reported." Upon information and belief, NRA personnel failed to take appropriate steps to protect the whistleblowers and took affirmative steps to conceal the nature and scope of the NRA whistleblower' concerns from its external auditors.⁴⁸

⁴⁷ See Appendix Exhibit 1 at 85-91.

⁴⁸ See also Appendix Exhibit 1 at 121-24.

B. Appointment of a trustee is also appropriate under § 1104(a)(2).

86. Courts have broad discretion to appoint a Chapter 11 trustee even absent a finding of “cause,” when such “appointment is in the interests of creditors, any equity security holders, and other interests of the estate....” *See* 11 U.S.C. § 1104(a)(2). In making its determination of whether to exercise its equitable powers to appoint a trustee under Section 1104(a)(2), courts “look to the practical realities and necessities inescapably involved in reconciling competing interests.” *See In re Hotel Assocs., Inc.*, 3 B.R. 343, 345 (Bankr. E.D. Pa. 1980).

87. In deciding whether a trustee should be appointed under Section 1104(a)(2), courts commonly consider the following factors: (1) the debtor’s trustworthiness; (2) past and present performance and the potential for reorganization; (3) whether creditors have confidence in present management; and (4) the benefits of appointing a trustee balanced against the cost of appointment. *See In re Morningstar Marketplace, Ltd.*, 544 B.R. 297, 304 (Bankr. M.D. Pa. 2016)(citing *Europark Indus., Inc.*, 424 B.R. at 621); *In re Ionosphere Clubs, Inc.*, 113 B.R. 164 (Bankr. S.D.N.Y. 1990); *see also Evans*, 48 B.R. at 48.

88. In this case, consideration of the factors weighs in favor of a trustee. As discussed above, the NRA, LaPierre and the management teams he has put into place have a long-standing history of failing in their fiduciary duties to the NRA and lacking honesty and care in their oversight of the NRA’s charitable assets. These facts, including a history of filing false and misleading regulatory filings, leads to the conclusion that the NRA’s current top management cannot be trusted. Similarly, the NRA’s past performance—management’s abuse of expense and reimbursement policies, disregard of New York regulatory laws, and failure to establish any meaningful oversight—should be considered and weighed in determining the equity of appointing a chapter 11 trustee. The lack of trust in the current management is further demonstrated by, for example, former NRA Board member Phillip Journey’s filing of a request for appointment of an

examiner⁴⁹ and commencement of an NRA member class action against the NRA in the Middle District of Tennessee.⁵⁰ Where, as here, a debtor’s “inherent conflicts extend beyond the healthy conflicts that always exist between debtor and creditor,” a trustee is warranted. *See Marvel* 140 F.3d at 472-73 and 474 (*citing and relying on Cajun Elec.*, 74 F.3d at 600 (adopting dissent 69 F.3d at 751)).

89. In light of the fraud, dishonesty, false filings, and gross mismanagement, it is respectfully submitted that a trustee should be appointed under 11 U.S.C. § 1104(a)(1). Further, given the contentious litigation, the conduct demonstrated in relation to the filing of these bankruptcy cases, and the lack of trust in the NRA’s current management, a trustee is necessary to serve the best interests of the estate and the creditors under § 1104(a)(2).

CONCLUSION

90. This case presents an extraordinary and unique set of facts. In the face of the substantial allegations of illegal conduct in the state in which it is chartered, and a pending enforcement action there, the NRA has decided that it can cross state borders with its assets and open up in a different jurisdiction to evade law enforcement action. It has filed for bankruptcy using a newly formed subsidiary, while claiming to be financially solvent, to avoid regulation in the state where is chartered and subject to oversight.

91. Given the particular facts before the Court, it is respectfully submitted that this bankruptcy proceeding was brought in bad faith and should be dismissed. In the alternative, a trustee should be appointed for cause based upon the demonstration of fraud, dishonesty, and gross mismanagement by the current management, and to protect the interests of creditors and the estate itself.

⁴⁹ See Motion for Appointment of Examiner [Docket No. 114].

⁵⁰ See *Dell’Aquila v. NRA*, M.D. Tenn. Case. No. 19-cv-00679.

Dated: February 12, 2021.

Respectfully submitted,

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**COUNSEL FOR THE PEOPLE OF
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LETITIA JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK**

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2021, a true and correct copy of the foregoing was served upon all parties entitled to notice, including the Debtors and United States Trustee, via the Court's electronic transmission facilities.

/s/ Gerrit M. Pronske

Gerrit M. Pronske

EXHIBIT C



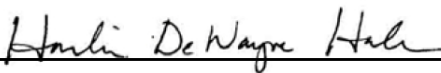
CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed May 11, 2021


United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	Chapter 11
	§	
National Rifle Association of America	§	Case No. 21-30085 (HDH)
and Sea Girt LLC,	§	
	§	(Jointly Administered)
Debtors.	§	

ORDER GRANTING MOTIONS TO DISMISS

The National Rifle Association of America (the “NRA”) is a 150-year-old organization with approximately five million members that is dedicated to the rights of Americans to own and safely use firearms for their personal protection and recreational use. The mission and function of the NRA is focused on gun safety, and the NRA asserts it is “the nation’s foremost defender” of the Second Amendment of the United States Constitution. In recent years, however, it has become apparent that the NRA was suffering from inadequate governance and internal controls.

The attorney general for the state of New York conducted a fifteen-month-long investigation of the NRA that revealed, the New York attorney general claims, widespread misuse of assets by the NRA’s executive vice president and his circle of insiders for their personal benefit. Nine months ago, the New York attorney general filed a lawsuit seeking dissolution of the NRA

based on allegations that (1) the NRA has exceeded the authority conferred upon it by New York law and has conducted its business in a persistently illegal manner and abused its powers contrary to the public policy of the state of New York by operating without effective oversight or control by its officers and directors, and (2) the directors or members in control of the NRA have looted or wasted the corporate assets, have perpetuated the corporation solely for their personal benefit, or have otherwise acted in an illegal, oppressive, or fraudulent manner.

The NRA filed this case seeking the protection of the Bankruptcy Code to preserve itself as a going concern in the face of litigation that, it argues, poses an existential threat. Debtors commonly file bankruptcy when faced with a judgment that has, or will, render them insolvent, but the threat against the NRA differs from the classic scenario in that dissolution would not be a collateral effect of litigation but rather the intended relief sought in a state's regulatory action. And in this instance, dissolution could only occur after judicial consideration of whether dissolution is in the best interest of the public.

The question the Court is faced with is whether the existential threat facing the NRA is the type of threat that the Bankruptcy Code is meant to protect against. The Court believes it is not. For the reasons stated herein, the Court finds there is cause to dismiss this bankruptcy case as not having been filed in good faith both because it was filed to gain an unfair litigation advantage and because it was filed to avoid a state regulatory scheme. The Court further finds the appointment of a trustee or examiner would, at this time, not be in the best interests of creditors and the estate.

I. Jurisdiction and Venue

This Court has jurisdiction to consider this matter under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.

II. Relevant Background

The NRA is a charitable not-for-profit corporation chartered by special act of the New York State Legislature on November 17, 1871. The NRA has approximately five million members, almost 500 employees, and annual revenue of approximately \$300 million. The NRA is primarily supported by dues from members and private contributions from donors.

Around the middle of 2017, NRA Board Member Tom King received a phone call from Eric Schneiderman, who at the time was the New York attorney general.¹ According to Mr. King, Mr. Schneiderman told him that investigations into the NRA were being opened and they should “prepare for the worst.”² Mr. King shared this message with Wayne LaPierre,³ the NRA’s executive vice president.⁴ In response to this warning, Mr. LaPierre testified that he decided the “NRA ought to take a look at everything, a 360-degree look to make sure we were in total compliance with New York State not-for-profit law, and if we weren’t, we needed to fix things.”⁵ This was the beginning of what the NRA now refers to as its course correction.⁶

As part of its course correction, the NRA hired the law firm Morgan, Lewis & Bockius LLP to provide advice regarding tax and nonprofit governance matters.⁷ The NRA also hired Brewer, Attorneys & Counselors (the “Brewer Firm”) in early 2018 to aid with the course

¹ *Transcript of Hearing Held April 21, 2021* [Docket No. 670] at 79:3-80:7; *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 62:12-16.

² *Transcript of Hearing Held April 21, 2021* [Docket No. 670] at 79:18-80:1.

³ *Transcript of Hearing Held April 21, 2021* [Docket No. 670] at 80:19-81:2.

⁴ In the NRA’s organizational structure, the executive vice president is the functional equivalent of a chief executive officer. See Ackerman Exhibit 10 (NRA Bylaws, Article V, section 2(c)).

⁵ *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 41:25-42:14.

⁶ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 62:8-11.

⁷ *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 43:17-44:1; *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 62:19-63:12.

correction process and potential upcoming litigation.⁸ Since that time, in addition to becoming the NRA's primary litigation counsel, the Brewer Firm appears to have become involved in many aspects of the NRA.

In March 2018, the NRA hired Craig Spray as its new chief financial officer.⁹ Before joining the NRA, Mr. Spray served as the chief financial officer for two different companies, one of which was a publicly traded company valued at over \$1 billion.

On April 19, 2018, the New York Department of Financial Services sent letters to insurers and financial institutions encouraging them to review their relationships with the NRA and consider whether such relationships harm their corporate reputations and jeopardize public safety (the "NY DFS Letter"). Less than a month later, the NRA, with the assistance of the Brewer Firm, filed a complaint in federal court in the Northern District of New York against the governor of New York and the New York Department of Financial Services regarding their alleged attempts "to deprive the NRA and its constituents of their First Amendment rights to speak freely about gun-related issues and defend their Second Amendment freedoms against encroachment."¹⁰

In July 2018, several whistleblowers came forward with the encouragement of Mr. Spray and presented a memo to the NRA Audit Committee regarding their top concerns (the "Whistleblower Memo").¹¹ That list included concerns related to (1) financial conflicts of interest of senior management and board members, (2) senior management override of internal controls relating to, among other things, accounts payable procedures, travel and expense reporting, and procurement/contracts policy, (3) management making decisions in the best interests of vendors

⁸ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 67:13-16; *Transcript of Hearing Held April 21, 2021* [Docket No. 670] at 81:3-9; *Transcript of Hearing Held April 23, 2021* [Docket No. 697] at 148:16-19.

⁹ The board of directors also elected Mr. Spray as the treasurer of the NRA in September 2018.

¹⁰ NRA Exhibit 663.

¹¹ *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 95:1-21; NYAG Exhibit 72.

instead of the NRA, (4) vague and deceptive billing practices of vendors, (5) improper reimbursement for apartments and living expenses of certain employees, and (6) lack of control over vehicle leases obtained by senior management.¹²

Following the presentation of the Whistleblower Memo to the Audit Committee, the NRA took several actions, including examining related party transactions and reviewing vendor contracts.¹³ As a result of this review process, the NRA required the inclusion of specific metrics in all contracts¹⁴ and improved documentation and recordkeeping.¹⁵ One of the more significant actions taken in response to the Whistleblower Memo was to send letters to the NRA's vendors notifying them of the rules regarding proper invoicing.¹⁶ While most vendors complied with these new measures, some did not.¹⁷ As a result, some contracts with vendors were re-negotiated, and some were terminated.¹⁸

This process caused a rift between the NRA and one of its most significant vendors, Ackerman McQueen, Inc. ("Ackerman"). Ackerman had very close ties with the NRA and had been the NRA's marketing and public relations firm for decades, but several of the concerns expressed in the Whistleblower Memo related to the NRA's relationship with Ackerman.¹⁹ The disagreements that came from discussions regarding billing practices and their business

¹² NYAG Exhibit 72.

¹³ *Transcript of Hearing Held April 23, 2021* [Docket No. 697] at 90:4-19.

¹⁴ *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 69:22-70:2.

¹⁵ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 24:24-25:9; *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 157:6-20.

¹⁶ *Transcript of Hearing Held April 23, 2021* [Docket No. 697] at 90:4-19; *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 25:10-25; *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 91:8-17.

¹⁷ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 91:8-92:4.

¹⁸ *Transcript of Hearing Held April 23, 2021* [Docket No. 697] at 91:2-9.

¹⁹ NYAG Exhibit 72.

relationship escalated and have spawned four overlapping lawsuits—three in Virginia state court and one in federal court in the Northern District of Texas.

On August 6, 2020, following a fifteen-month investigation, the New York attorney general (the “NYAG”) filed a complaint in New York state court against the NRA seeking, among other relief, dissolution of the NRA (the “NYAG Complaint” commencing the “NYAG Enforcement Action”).²⁰ The NYAG Complaint also named four individual defendants: (1) Mr. LaPierre; (2) John Frazer, the NRA’s general counsel; (3) the NRA’s former treasurer and chief financial officer; and (4) the NRA’s former chief of staff. The allegations in the 163-page NYAG Complaint are extensive but, in very general terms, accuse Mr. LaPierre of (i) exploiting the NRA for his financial benefit and the benefit of a close circle of NRA staff, board members, and vendors, (ii) intimidating, punishing, and expelling anyone at a senior level who raised concerns about his conduct, (iii) hiring and retaining individuals in senior positions at the NRA, or as NRA contractors, whom he believed would aid and enable him to control the organization, regardless of their skills, experience, integrity, or contribution to the charitable mission, and (iv) entering into post-employment agreements with departing officers and employees that provided excessive payments in exchange for little, if any, services and non-disclosure/non-disparagement agreements. Other of the individual defendants were accused of (i) ignoring, overriding, or otherwise violating the bylaws and internal policies and procedures they were charged with enforcing, resulting in charitable assets being diverted to benefit NRA insiders and favored vendors, (ii) instituting a practice whereby millions of dollars in entertainment and travel expenses incurred by NRA executives were billed to the NRA as disbursements by the NRA’s largest vendor, and (iii) circumventing internal controls, condoning or partaking in expenditures that were

²⁰ NYAG Exhibit 107.

an inappropriate and wasteful use of charitable assets, and concealing or misreporting relevant information, rendering the NRA's annual reports filed with the NYAG materially false and misleading. The NYAG Complaint, in addition to dissolution of the NRA, seeks (i) restitution of certain funds paid to current and former officers, which would be returned to the NRA, (ii) a ban on certain former and current officers, including Mr. LaPierre and Mr. Frazer, from serving as fiduciaries of any New York charity, and (iii) voiding of certain transactions.²¹

On September 10, 2020, Carolyn Meadows (the NRA's President) created a Special Litigation Committee to oversee (i) the NYAG Enforcement Action, (ii) a lawsuit filed against the NRA and the NRA Foundation by the District of Columbia attorney general, (iii) the NRA's pending lawsuit against the NYAG, and (iv) any future proceedings that arise out of or relate to the previously-identified matters. In an e-mail sent to the board of directors, Ms. Meadows explained that the creation of the Special Litigation Committee was done on the advice of counsel to avoid the appearance of any conflict because Mr. LaPierre and Mr. Frazer were named as individual defendants in the NYAG Enforcement Action.²² The Special Litigation Committee's members were Ms. Meadows, Charles Cotton (the NRA's First Vice President), and Colonel Willes Lee (the NRA's Second Vice President).

On November 18, 2020, the NRA filed its IRS Form 990 signed by Mr. LaPierre.²³ This form is an annual informational tax return filed by a nonprofit to justify maintaining its tax-exempt status. In the Form 990, the NRA disclosed several excess benefit transactions entered into by individuals at the NRA, including Mr. LaPierre.

²¹ *Id.*

²² NYAG Exhibit 1.

²³ NYAG Exhibit 8.

On November 23, 2020, the NRA hired the Neligan Law Firm to advise on bankruptcy and restructuring options.²⁴ The next day, Sea Girt, LLC was formed as a transition vehicle to facilitate the NRA's relocation to Texas.²⁵

On January 7, 2021, the NRA held a board meeting. At this meeting, the board of directors adopted a resolution formalizing the Special Litigation Committee.²⁶ The board of directors also passed a resolution approving an employment agreement for Mr. LaPierre.²⁷ Significantly, Mr. LaPierre's employment agreement contained language permitting Mr. LaPierre to "exercise corporate authority in furtherance of the mission and interests of the NRA, including without limitation to reorganize or restructure the affairs of the Association for the purposes of cost-minimization, regulatory compliance or otherwise."²⁸ Throughout the entirety of the board meeting, both in the general and executive sessions, no discussion of bankruptcy, Chapter 11, or the possible reorganization of the NRA occurred.²⁹ The board of directors was not informed that the language cited above could authorize Mr. LaPierre to unilaterally authorize a petition for bankruptcy relief for the NRA. In fact, the board of directors was not informed that the NRA was considering filing for bankruptcy at all.³⁰

On January 15, 2021, the NRA and Sea Girt, LLC filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. The cases are being jointly administered.³¹ On February 8,

²⁴ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 98:9-99:25; NYAG Exhibit 298.

²⁵ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 89:3-10; NYAG Exhibit 347.

²⁶ NYAG Exhibits 2, 3.

²⁷ NYAG Exhibit 3.

²⁸ NYAG Exhibit 50.

²⁹ *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 92:1-93:10; *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 76:15-21; *Transcript of Hearing Held April 8, 2021* [Docket No. 544] at 92:24-93:4.

³⁰ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 118:8-16; *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 47:7-10; *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 85:24-86:16.

³¹ *Order Granting Debtors' Emergency Motion for Joint Administration of Chapter 11 Cases* [Docket No. 36].

2021, Judge Phillip Journey,³² a longtime member, donor, and director of the NRA, filed a motion seeking the appointment of an examiner with special duties and powers under section 1104(c) of the Bankruptcy Code to investigate the governance of the NRA and the actions of its management (the “Examiner Motion”).³³ The Examiner Motion was originally set for hearing on March 9, 2021.³⁴

On February 10, 2021, Ackerman, now a former vendor and current litigation adversary of the NRA, filed a motion to dismiss the Chapter 11 case or, in the alternative, appoint a Chapter 11 trustee pursuant to section 1104(a) of the Bankruptcy Code.³⁵ The motion to dismiss filed by Ackerman was quickly followed by similar motions filed by the NYAG³⁶ and the District of Columbia attorney general³⁷ (the “Motions to Dismiss”) and a joinder filed by Christopher W. Cox, a former executive director of the NRA Institute for Legislative Action.³⁸ Because of the overlapping facts and interrelated relief being requested in the Examiner Motion and the Motions to Dismiss, the Court chose to set them for trial together after a brief period of time for expedited discovery.

³² Judge Phillip Journey currently serves as the Division 1 Judge of the 18th Judicial District Court of Kansas.

³³ *Motion for Appointment of Examiner* [Docket No. 114].

³⁴ *See Notice of Hearing* [Docket No. 130].

³⁵ *Ackerman McQueen, Inc.’s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support* [Docket No. 131].

³⁶ *The State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee* [Docket No. 155]; *The State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee* [Docket No. 163].

³⁷ *The District of Columbia’s Motion in Support in the State of New York’s Motion to Appoint Chapter 11 Trustee* [Docket No. 214]; *The District of Columbia’s Motion in Support in the State of New York’s Motion to Dismiss* [Docket No. 429].

³⁸ *Christopher W. Cox’s Joinder to (I) the Motions to Dismiss or, in the Alternative, to Appoint a Chapter 11 Trustee Filed by Ackerman McQueen, Inc. and the State of New York, or (II) the Motion of Phillip Journey for Appointment of an Examiner* [Docket No. 172].

In the following weeks, the many parties involved in this case—each with different interests, perspectives, and goals—engaged in discovery and began to take positions on the motions filed and the various relief requested therein. Judge Journey filed an objection to the Motions to Dismiss but amended his previous request for an examiner to include an expanded role for the proposed examiner.³⁹ The Official Committee of Unsecured Creditors (the “Committee”) took the position that while the NRA is in need of major changes to its governance, current management should not be displaced by a Chapter 11 trustee, but if a trustee is appointed, they should have limited powers. The Committee also took the position that the NRA should retain a chief restructuring officer and that the appointment of an examiner was not necessary because the Committee was already fulfilling that role.⁴⁰

The NRA opposed all of the motions but did eventually consent to the appointment of a chief restructuring officer.⁴¹

David Dell’Aquila, a member of the Committee and the plaintiff in a purported class action against the NRA, filed a partial joinder opposing dismissal but supporting the appointment of a Chapter 11 trustee with limited authority.⁴²

³⁹ *Limited Objection to the Motions to Dismiss or the Appointment of Trustee* [Docket No. 306].

⁴⁰ *The Official Committee of Unsecured Creditors’ Objection to the Motion for Appointment of an Examiner* [Docket No. 354]; *The Official Committee of Unsecured Creditors’ Omnibus Response to (I) Ackerman McQueen, Inc.’s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support, (II) the State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee, and (III) the District of Columbia’s Motion in Support in the State of New York’s Motion to Appoint Chapter 11 Trustee* [Docket No. 368].

⁴¹ *Omnibus Opposition to (1) Ackerman McQueen, Inc.’s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, (2) the State of New York’s Motion to Dismiss or, in the Alternative, to Appoint Chapter 11 Trustee, and (3) the District of Columbia’s Motion to Appoint Chapter 11 Trustee* [Docket No. 307]; *Debtor’s Response in Opposition to the Motion for Appointment of an Examiner Filed by Phillip Journey* [Docket No. 358].

⁴² *David Dell’Aquila’s Partial Joinder to (I) Ackerman McQueen, Inc.’s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support, (II) the State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee, (III) the District of Columbia’s Motion in Support in the State of New York’s Motion to Appoint Chapter 11 Trustee, and (IV) the Official Committee of Unsecured Creditors Motion in Response to (I), (II), and (III)* [Docket No. 415].

The United States Trustee did not initially express an opinion regarding the underlying motions but did express views on several of the options the parties had discussed.⁴³ Specifically, the United States Trustee took the position that there is no such entity as a limited purpose trustee under the Bankruptcy Code, and if the Court orders the appointment of a Chapter 11 trustee, the trustee must have full statutory powers. The United States Trustee also took the position that while an examiner may be granted expanded powers, the Bankruptcy Code does not permit a chief restructuring officer to usurp the powers of a Chapter 11 trustee.⁴⁴

Sixteen states, as *amici curiae*, filed a brief in support of the NRA,⁴⁵ and the state of Texas submitted its own brief in support of the NRA.⁴⁶

Trial commenced on April 5, 2021 and continued over twelve days with twenty-three witnesses. On April 7, 2021, the NRA filed an application to employ a chief restructuring officer,⁴⁷ which the Court heard concurrently with the ongoing trial. Closing arguments took place on May 3, 2021, after which the Court took the matters under advisement.

⁴³ In closing arguments following trial, the United States Trustee took the position that the evidence supports dismissal, the appointment of a trustee, or the appointment of an examiner.

⁴⁴ *United States Trustee's Statement Regarding Motions Seeking Appointment of Examiner, Trustee, or Case Dismissal* [Docket No. 405].

⁴⁵ *Brief of the States of Arkansas, Alabama, Alaska, Georgia, Idaho, Kentucky, Louisiana, Mississippi, Missouri, Montana, Ohio, Oklahoma, South Carolina, South Dakota, Utah, and West Virginia as Amici Curiae in Support of Debtors; and in Opposition to the State of New York's Motion to Dismiss, or in the Alternative to Appoint a Chapter 11 Trustee* [Docket No. 445].

⁴⁶ *Brief of the State of Texas as Amicus Curiae in Support of Debtors; and in Opposition to the State of New York's Motion to Dismiss, or in the Alternative to Appoint a Chapter 11 Trustee* [Docket No. 465].

⁴⁷ *Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis E. Robichaux IV as the Debtors' Chief Restructuring Officer* [Docket No. 519] (the "CRO Motion").

III. Applicable Legal Standard

The movants generally seek three forms of relief: dismissal of the bankruptcy cases, the appointment of a Chapter 11 trustee, or the appointment of an examiner. Pursuant to section 1112(b) of the Bankruptcy Code, the court shall dismiss a case under this chapter for cause unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate.⁴⁸ Section 1112(b)(4) contains a non-exclusive list of what constitutes “cause” for purposes of dismissal, but the Fifth Circuit Court of Appeals has held that the term “cause” affords flexibility to the bankruptcy courts and can include a finding that the debtor’s filing for relief is not in good faith. *In re Little Creek Dev. Co.*, 779 F.2d 1068, 1072-73 (5th Cir. 1986); *In re Humble Place Joint Venture*, 936 F.2d 814, 816-17 (5th Cir. 1991).

After the movant satisfies the initial burden of making a prima facie showing of a lack of good faith in filing, the burden shifts to the debtor to demonstrate good faith. *In re Mirant Corp.*, 2005 Bankr. LEXIS 1686, at *27 n.20 (Bankr. N.D. Tex. Jan. 26, 2005) (noting that some courts hold that the burden of showing good faith is on the debtor while other courts hold that the movant has an initial burden to present a prima facie case of a lack of good faith before the burden shifts to the debtor to show good faith); *In re Sherwood Enters., Inc.*, 112 B.R. 165, 170-71 (Bankr. S.D. Tex. 1989). Furthermore, courts have held that a Chapter 11 petition is not filed in good faith unless it serves a valid bankruptcy purpose. *Off. Comm. of Unsecured Creditors v. Nucor Corp.* (*In re SGL Carbon Corp.*), 200 F.3d 154, 165 (3d Cir. 1999).

If a court finds cause for dismissal, it must dismiss the case unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of

⁴⁸ Section 1112(b) also requires consideration of whether conversion to a case under chapter 7 would be in the best interests of creditors and the estate, but pursuant to section 1112(c), in cases where the debtor is a nonprofit, the court may not convert a case under chapter 11 to a case under chapter 7 unless the debtor requests such a conversion. The NRA has not requested such a conversion, so the Court need not consider it in this case.

creditors and the estate. Pursuant to section 1104(a), at any time after the commencement of the case but before confirmation of a plan, on request of a party in interest or the United States Trustee, and after notice and a hearing, the court shall order the appointment of a trustee (1) for cause, including fraud, dishonesty, incompetence, or gross mismanagement of the affairs of the debtor by current management, either before or after the commencement of the case, or similar cause, but not including the number of holders of securities of the debtor or the amount of assets or liabilities of the debtor; or (2) if such appointment is in the interests of creditors, any equity security holders, and other interests of the estate, without regard to the number of holders of securities of the debtor or the amount of assets or liabilities of the debtor.

Pursuant to section 1104(c), if the court does not order the appointment of a trustee, then at any time before the confirmation of a plan, on request of a party in interest or the United States Trustee, and after notice and a hearing, the court shall order the appointment of an examiner to conduct such an investigation of the debtor as is appropriate, including an investigation of any allegations of fraud, dishonesty, incompetence, misconduct, mismanagement, or irregularity in the management of the affairs of the debtor or by current or former management of the debtor, if (1) such appointment is in the interests of creditors, any equity security holders, and other interests of the estate or (2) the debtor's fixed, liquidated, unsecured debts, other than debts for goods, services, or taxes, or owing to an insider, exceed \$5,000,000.

IV. Discussion

Because of the structure of the relevant provisions of the Bankruptcy Code, the Court will first determine whether there is cause for dismissal and, specifically, whether the NRA filed for bankruptcy in good faith.

The NRA's Stated Reasons for Filing Bankruptcy

At various times in this case, the NRA has provided the Court with several—and at times slightly different—reasons for why this bankruptcy case was filed.⁴⁹ In an informational brief filed on January 20, 2021, the NRA explained that it “instituted this chapter 11 reorganization proceeding to establish a centralized, neutral forum in which it can streamline, resolve, and address all outstanding claims and preserve its ability to pursue its constitutionally protected mission as a going concern” and that it “intends to restructure through a plan of reorganization that provides for the reorganized NRA to emerge from these chapter 11 cases as a Texas nonprofit entity.”⁵⁰ The NRA went on to explain that “separate and apart from the on-going disputes with the NYAG, the NRA seeks to avail itself of the protections of the Bankruptcy Code in order to continue its efforts to reduce operating costs and to address the ever-increasing litigation being filed against the NRA” and that “[c]ontrary to the NYAG’s press releases, the NRA is not seeking to evade regulatory oversight; rather it seeks, and is entitled, to being treated fairly by regulators providing that oversight.”⁵¹ Finally, the NRA announced its intention to propose a plan of reorganization that will (1) pay all of the allowed claims of the NRA’s creditors in full, (2) provide a mechanism for adjudicating and/or resolving the claims of the NYAG and any other creditor with contingent,

⁴⁹ In its discussion, the Court will focus on the NRA rather than Sea Girt, LLC. Sea Girt, LLC has no employees or operations and was formed to accomplish a shared bankruptcy purpose with the NRA.

⁵⁰ *Debtors’ Informational Brief in Connection with Voluntary Chapter 11 Petitions* [Docket No. 31] at ¶¶ 3, 6.

⁵¹ *Id.* at ¶ 26.

unliquidated, and disputed claims, and (3) allow the NRA to exit Chapter 11 as a Texas nonprofit organization.⁵²

Counsel for the NRA reiterated these reasons at the hearing held on January 20, 2021, with a particular emphasis on (1) the cost of ongoing litigation and the time and effort of the NRA management team being spent on litigation, (2) the need for a breathing spell and an opportunity to centralize litigation, and (3) the NRA's desire to emerge from bankruptcy as a company domiciled in Texas.⁵³ Counsel for the NRA went so far as to say that "absent being able to streamline discovery and have all of this litigation, or much of it, handled in a centralized forum, the NRA was indeed facing the adage, death by a thousand cuts."⁵⁴

In the Examiner Motion and the Motions to Dismiss, the other parties offered different opinions on the true purpose of the NRA's bankruptcy. Judge Journey took the position that if the NRA was able to successfully terminate its corporate existence in New York and reconstitute the organization under Texas law, the NRA wishes to "avoid the ongoing challenges to its corporate charter brought by the State of New York and other ongoing litigation."⁵⁵ Ackerman accused the NRA of primarily using the bankruptcy filing to escape civil prosecution and avoid regulatory oversight from the NYAG, but also to stall litigation.⁵⁶ The NYAG agreed with Ackerman that the NRA's purpose in filing bankruptcy was to evade regulatory oversight.⁵⁷

⁵² *Id.* at ¶ 27.

⁵³ *Transcript of Hearing Held January 20, 2021* [Docket No. 55] at 11:8-17, 12:1-14:9, 15:2-6.

⁵⁴ *Id.* at 12:19-23.

⁵⁵ *Motion for Appointment of Examiner* [Docket No. 114] at 2.

⁵⁶ *Ackerman McQueen, Inc.'s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support* [Docket No. 131] at ¶¶ 2, 29-31.

⁵⁷ *The State of New York's Memorandum of Law and Brief in Support of Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee* [Docket No. 156] at ¶¶ 3, 20, 24.

In its brief in opposition to the Examiner Motion and the Motions to Dismiss, the NRA again summarized its reasons for filing bankruptcy, but in a slightly more expansive way:

On January 15, 2021, the Debtors filed their chapter 11 petitions with a series of goals:

- a. The Debtors seek to streamline the barrage of litigation they are facing. Although the Debtors expect to ultimately prevail on the merits in many pending cases, the disruption and expense of such litigation creates significant burdens for the NRA.
- b. The organizational structure of the NRA is based on a 150-year-old charter that has not been updated in over a century. Given the size and impact that the NRA now has, the organization would benefit from the modernization to ensure its continued existence as a going concern for the benefit of the NRA's creditors and members.
- c. While this case is certainly unique, ultimately, the NRA is not unlike a typical chapter 11 debtor grappling with the typical operational strains with which chapter 11 is designed to assist. The NRA seeks to reduce operating expenses, address burdensome executory contracts and unexpired leases, maintain its employees and operations, and institute and effectuate a streamlined claims process to address the multitude of claims and repayment through a confirmed plan of reorganization.
- d. The NRA seeks to move its corporate domicile and its principal place of business to Texas which, as has been widely reported, welcomes the NRA with open arms.⁵⁸

Later in the brief, the NRA acknowledged that there is no judgment against it and no impending trial but expressed the belief that it faces existential threats:

The NRA filed for protection under chapter 11 in good faith, not to circumvent judgments in other courts (in fact, no judgments have been rendered), nor to escape an impending trial (because there is none), but because it is in a situation where it must be able to continue its operations in the face of existential threats, in order to maximize the value of its estate and to protect the interests of its members, employees, vendors, and legitimate creditors.⁵⁹

⁵⁸ *Omnibus Opposition to (1) Ackerman McQueen, Inc.'s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, (2) the State of New York's Motion to Dismiss or, in the Alternative, to Appoint Chapter 11 Trustee, and (3) the District of Columbia's Motion to Appoint Chapter 11 Trustee* [Docket No. 307] at p. 13, ¶ 40.

⁵⁹ *Id.* at p. 25, ¶ 38.

In its briefing, the Committee seemed to agree that the NRA's primary goal was to avoid dissolution in the NYAG Enforcement Action but did not find this to be an improper motive and also saw other benefits for the NRA in bankruptcy:

In seeking the dismissal of these Chapter 11 Cases, the Moving Parties conflate the concept of litigation gamesmanship with prudent liability management. The Debtors filed these bankruptcy cases not to gain a tactical litigation advantage, but to implement a strategy *to survive* in the event of a potential adverse ruling in the NYAG Action. As described below, there could not be a more fundamental and proper use of the federal bankruptcy laws than preservation of and as a going-concern.

....

In addition to protecting the NRA from dissolution, these Chapter 11 Cases also offer the NRA an opportunity to implement corporate governance changes that will promote transparency and increase public confidence in the way the NRA handles its finances, conducts business with vendors and customers, and safeguards against future mismanagement.⁶⁰

In the NRA's opening statement at trial, the stated reasons for filing bankruptcy were significantly narrower than in the NRA's briefing and appeared to focus heavily on the NYAG Enforcement Action:

The exclusive testimony as to good faith will be we had three goals in mind. First, avoid the death penalty. Avoid dissolution. Two, avoid a receiver in a New York state court that would deny us the ability to file. And third, we wholly embrace our third goal. Our third goal is to [. . .] remove ourselves from New York and relocate ourselves to Texas.⁶¹

It is against this backdrop that the Court evaluates the evidence presented at trial regarding the NRA's reasons for filing bankruptcy.

⁶⁰ *The Official Committee of Unsecured Creditors' Omnibus Response to (I) Ackerman McQueen, Inc.'s Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support, (II) the State of New York's Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee, and (III) the District of Columbia's Motion in Support in the State of New York's Motion to Appoint Chapter 11 Trustee* [Docket No. 368] at ¶¶ 24, 31 (emphasis in original).

⁶¹ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 40:25-41:7.

Evidence of the NRA's Reasons for Filing Bankruptcy

The parties elicited testimony from several witnesses regarding the NRA's reasons for filing bankruptcy, but the way in which the Court has weighed that evidence is based on the somewhat unusual way in which this case was filed. There was no vote on whether the NRA should file for bankruptcy, and therefore there is no need to resolve inconsistent or conflicting reasoning and motivations of individuals who all had an equal say in the decision. Rather, the ultimate decision to file for bankruptcy was made solely by Mr. LaPierre.⁶² As a result, Mr. LaPierre's testimony is the most direct, and, since the Court finds it credible on this topic, the most compelling evidence for why the NRA filed for bankruptcy, but it is not the only evidence to consider.⁶³ Mr. LaPierre consulted the three members of the Special Litigation Committee about the decision to file bankruptcy before it was made,⁶⁴ so their knowledge of the decision-making process is also relevant. The only other person within the NRA who appears to have known about the decision to file bankruptcy prior to the actual filing was the NRA spokesman,⁶⁵ but he did not testify. Neither the NRA's treasurer and then-CFO nor the NRA's current acting CFO were consulted about the decision to file bankruptcy, and they only learned of the decision after bankruptcy was filed.⁶⁶ Nevertheless, they were both able to offer helpful testimony regarding

⁶² *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 84:8-19; *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 68:1-8, 70:12-72:23.

⁶³ See *Elmwood Dev. Co. v. Gen. Elec. Pension Tr. (In re Elmwood Dev. Co.)*, 964 F.2d 508, 512 (5th Cir. 1992) ("Because the good faith standard is an objective one, the court was not constrained to entertain and give dispositive weight to testimony of the subjective state of mind of [the debtor's] manager."); *In re Little Creek Dev. Co.*, 779 F.2d 1068, 1072-73 (5th Cir. 1986) (stating that in determining whether a debtor's filing for relief is in good faith, courts must consider a conglomerate of factors, including motives).

⁶⁴ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 84:8-85:11; *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 36:18-23; NYAG Exhibit 4 at 5-10.

⁶⁵ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 72:11-23.

⁶⁶ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 70:12-17; *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 119:23-120:1; *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 49:7-11; *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 54:12-21; *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 85:19-22.

potential reasons for the bankruptcy, including the cost of litigation and the financial condition of the NRA. The NRA's general counsel also offered testimony regarding reasons for the NRA to file for bankruptcy, but he did not participate in the actual decision-making process and did not know about the decision to file bankruptcy until bankruptcy had already been filed.⁶⁷

There was a general consensus among the witnesses that, as the NRA has consistently represented to the Court and to its members, the NRA is in its strongest financial condition in years⁶⁸ and intends to pay creditors all allowed claims in full.⁶⁹ The CFO at the time of the bankruptcy filing, Mr. Spray, testified that there was no financial reason for the NRA to file bankruptcy,⁷⁰ but he later qualified that testimony by noting that he did not have any information about potential litigation outcomes.⁷¹ The current acting CFO, Ms. Rowling, gave supporting testimony regarding the financial strength of the NRA and its ongoing ability to pay its creditors⁷² and testified that the NRA has sufficient funds to prosecute and defend its current litigation.⁷³ Ms. Rowling also testified, however, that it was her opinion that the NRA was in bankruptcy because of potential litigation losses that could severely impact the organization's financial position.⁷⁴

⁶⁷ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 118:17-119:21; *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 43:19-44:8.

⁶⁸ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 78:16-81:2; *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 32:24-33:2; *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 160:24-161:2; *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 33:12-14, 34:13-21; *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 51:21-53:13; NYAG Exhibit 151.

⁶⁹ *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 32:9-17; *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 52:22-53:5.

⁷⁰ *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 53:11-13, 129:17-130:20, 132:22-133:4.

⁷¹ *Transcript of Hearing Held April 16, 2021* [Docket No. 620] at 19:10-16.

⁷² *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 33:12-14, 34:13-21, 36:17-38:14.

⁷³ *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 39:17-23.

⁷⁴ *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 34:22-35:1.

The testimony of the NRA's general counsel, Mr. Frazer, on the reasons for filing bankruptcy was, in some respects, a bit difficult to reconcile. Despite not being involved in the decision to file for bankruptcy and not knowing about the decision until after bankruptcy was filed,⁷⁵ Mr. Frazer was designated as the corporate representative of the NRA as to the reasons, both financial and non-financial, for the NRA seeking protection under Chapter 11 of the Bankruptcy Code.⁷⁶ During his deposition, the only reasons for filing bankruptcy that Mr. Frazer identified were to streamline litigation, consolidate the claims against the NRA, and reorganize in Texas.⁷⁷ Mr. Frazer did not identify avoiding dissolution or avoiding receivership as reasons for the NRA filing bankruptcy at that time.⁷⁸ Nevertheless, Mr. Frazer testified at trial that he agreed the bankruptcy filing allowed the NRA to seek protection from regulators in New York.⁷⁹

With regard to the threats of dissolution or a receiver being appointed, it is clear that the NYAG was seeking dissolution of the NRA.⁸⁰ Nevertheless, Mr. Frazer was not sure if a trial date is currently set in the NYAG Enforcement Action but anticipated a trial early next year and acknowledged that dissolution is not imminent.⁸¹ Mr. Frazer also acknowledged having no personal knowledge of an imminent threat of a receiver being appointed over the NRA.⁸² With regard to streamlining litigation, Mr. Frazer reaffirmed that it is one of the NRA's reasons for filing

⁷⁵ *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 43:19-44:8, 109:22-24.

⁷⁶ *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 17:5-14.

⁷⁷ *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 17:15-20, 57:8-25.

⁷⁸ *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 20:20-21:1.

⁷⁹ *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 107:22-108:6; *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 21:12-19.

⁸⁰ See NYAG Exhibit 107 (NYAG Complaint in which the first two causes of action are labeled "Dissolution of the NRA").

⁸¹ *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 29:10-30:6, 30:19-22.

⁸² *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 33:18-34:11.

bankruptcy⁸³ but acknowledged that he has not conducted an analysis, and was not aware of anyone else conducting an analysis, of the cost of proceeding with litigation outside of bankruptcy versus the cost of the bankruptcy and proceeding with the litigation in the bankruptcy case.⁸⁴ Mr. Frazer also testified that the NRA previously filed a motion for centralization of four pending actions that was denied by the United States Judicial Panel on Multidistrict Litigation on the basis that they were not persuaded that centralization was necessary for the convenience of the parties and witnesses or to further the just and efficient conduct of the litigation.⁸⁵

The Court received testimony from all three members of the Special Litigation Committee, but their testimony did not explore the reasons for filing bankruptcy in much depth. The parties offered excerpts of the deposition of Ms. Meadows, but those excerpts did not include a discussion of why the NRA filed for bankruptcy. Colonel Lee testified that he understood the NYAG had sought the appointment of a receiver to seize the NRA's assets and that if a receiver were appointed over the NRA, it would be disastrous.⁸⁶ Mr. Cotton testified that he believed there was a risk that the NYAG could attempt to put the NRA into receivership because the first cause of action in the NYAG Complaint was for dissolution.⁸⁷ Mr. Cotton further testified that dissolution in the NYAG Enforcement Action was a legitimate risk that the NRA was concerned about.⁸⁸

During trial, Mr. LaPierre was questioned several times regarding why the NRA filed for bankruptcy. In response to a question of whether the NRA filed bankruptcy to leave New York, Mr. LaPierre testified that the NRA filed bankruptcy to look for a fair legal playing field where

⁸³ *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 109:2-11.

⁸⁴ *Transcript of Hearing Held April 6, 2021* [Docket No. 692] at 112:19-113:1.

⁸⁵ *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 36:20-38:12; Ackerman Exhibit 121.

⁸⁶ *Transcript of Hearing Held April 21, 2021* [Docket No. 673] at 45:10-46:2.

⁸⁷ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 37:3-7.

⁸⁸ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 38:15-39:10.

the NRA could prosper and grow in a fair legal environment⁸⁹ and later testified that the NRA needs the approval of a federal court to move to a new state.⁹⁰ At one point, Mr. LaPierre was presented with a series of communications informing the NRA's members, the NRA's board of directors, and the general public that the NRA had filed for bankruptcy and asked if the contents of those communications were accurate, which Mr. LaPierre testified they were.⁹¹ The communications, which were prepared by the NRA's Managing Director of Public Affairs working with a member of the Brewer Firm,⁹² described a variety of reasons for why the NRA filed bankruptcy, including leaving New York and reincorporating in Texas, seeking protection from New York officials, streamlining legal and financial affairs, organizing pending litigation in a coordinated and structured manner, and realizing other financial and strategic advantages. In one of the communications, a question and answer page posted on the NRA's website, the NRA states: "This action is necessitated primarily by one thing: the unhinged and political attack against the NRA by the New York Attorney General."⁹³ With regard to the risk of a receiver being appointed, Mr. LaPierre testified that the NRA has not been put on notice that the NYAG intends to seek a receivership and he does not have any facts to suggest that there is an imminent threat of a receiver being appointed.⁹⁴

The most helpful testimony from Mr. LaPierre came during an exchange when counsel for one of the movants was attempting to discern which of the many reasons for filing for bankruptcy

⁸⁹ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 66:11-23.

⁹⁰ *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 42:23-43:4.

⁹¹ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 67:14-25 (affirming the accuracy of NYAG Exhibit 153); *id.* at 86:18-21 (affirming the accuracy of NYAG Exhibit 55); *id.* at 87:5-18 (affirming the accuracy of NYAG Exhibit 151); *id.* at 87:22-88:8 (affirming the accuracy of NYAG Exhibit 208).

⁹² *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 88:1-4.

⁹³ NYAG Exhibit 208.

⁹⁴ *Transcript of Hearing Held April 8, 2021* [Docket No. 654] at 21:8-22:1.

that have been discussed was the real driving force behind Mr. LaPierre's decision. A few very valuable pieces of information came from that exchange. After establishing that the bankruptcy filing was not related to the NRA's financial condition,⁹⁵ Mr. LaPierre acknowledged that although the cost of defending the NYAG Enforcement Action was significant, the cost of bankruptcy is high as well.⁹⁶ Mr. LaPierre then confirmed that if the NRA's bankruptcy case is dismissed, the NRA would be able to pay its debts in full and meet its obligations.⁹⁷ The exchange continued:

Q: Okay. So it comes down to the reason you filed Chapter 11 is because you have this New York attorney general enforcement action which is asking for dissolution of the NRA; is that correct?

[Counsel for the NRA]: Objection; misstates his testimony.

[Counsel for the Movant]: Well --

THE COURT: Well, I'm going to go ahead and let him answer that. Try to give an answer to that, Mr. LaPierre.

THE WITNESS: Yes, Your Honor. Yes, we filed the Chapter 11 to -- because the New York State attorney general is seeking dissolution of the NRA and [seizure of] its assets, and we believe it's not a fair, level playing field.

....

Q: So really what we're down to is that it's -- the New York attorney general action is the reason you believe you need to be in bankruptcy, and, really, solvency and all your other litigation, those are not issues that would require you to be in bankruptcy; is that correct?

A: That's correct.

Transcript of Hearing Held April 8, 2021 [Docket No. 654] at 33:19-34:20.

⁹⁵ *Transcript of Hearing Held April 8, 2021 [Docket No. 654] at 32:9-20.*

⁹⁶ *Transcript of Hearing Held April 8, 2021 [Docket No. 654] at 32:15-23.*

⁹⁷ *Transcript of Hearing Held April 8, 2021 [Docket No. 654] at 32:24-33:2.*

The Court's Determination of the NRA's Primary Reason for Filing Bankruptcy

The evidence does not support a finding that the purpose of the NRA's bankruptcy filing was to reduce operating costs, to address burdensome executory contracts and unexpired leases, to modernize the NRA's charter and organization structure, or to obtain a breathing spell. While some of these could be added benefits of going through a bankruptcy process, they do not appear to have been significant considerations for the NRA.

There was some evidence that the NRA wants to streamline litigation and control litigation costs, but this does not appear to have been the real purpose behind filing for bankruptcy. Ms. Rowling testified that she believes the NRA is in bankruptcy because of potential litigation losses, but this concern did not appear to be shared by Mr. LaPierre or supported by other evidence. The testimony regarding the ongoing cost of litigation was that the NRA is currently able to afford to pay its legal fees and that there has not been an analysis of the cost of proceeding with litigation outside of bankruptcy versus the cost of the bankruptcy and proceeding with the litigation in the bankruptcy case. Furthermore, Mr. LaPierre testified that but for the NYAG Enforcement Action, it would not have been necessary to file for bankruptcy.

Whether the NRA's desire to leave New York and reincorporate in Texas was a true reason for filing bankruptcy is a closer call, but the evidence weighs in favor of a finding that it was not the real purpose for filing for bankruptcy. Several witnesses testified that New York is a hostile environment for the NRA,⁹⁸ but the testimony was that individuals within the organization had been interested in leaving New York and reincorporating in Texas for a long time.⁹⁹ The choice

⁹⁸ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 16:23-25; *Transcript of Hearing Held April 21, 2021* [Docket No. 670] at 7:25-8:12; *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 37:14-38:9; *Transcript of Hearing Held April 13, 2021* [Docket No. 584] at 146:1-8; *Transcript of Hearing Held April 7, 2021* [Docket No. 559] at 22:10-13; *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 66:11-20.

⁹⁹ *Transcript of Hearing Held April 6, 2021* [Docket No. 499] at 37:8-38:14.

to attempt to do so now—and to do so through a bankruptcy reorganization—appears to have been a means of achieving the more specific purpose of avoiding dissolution in the NYAG Enforcement Action.

In closing arguments at the conclusion of trial, there was a suggestion that part of the desire to move to Texas, and therefore part of the reason for filing bankruptcy, was due to the NRA having increasing difficulty with its relationships with financial institutions because of the NY DFS Letter.¹⁰⁰ The specific evidence on this topic came from Mr. Spray, who testified that he “didn’t know exactly what the catalyst was for their angst,” but that the NRA’s relationships with banks when Mr. Spray joined the NRA were tenuous and he had to find more enthusiastic banking support.¹⁰¹ Mr. Spray also testified that it was becoming difficult to get insurance when he joined the NRA and that problem has only gotten worse.¹⁰² Counsel for the NRA characterized this as an existential threat that the NRA was facing before the NYAG Enforcement Action was pending and a reason for filing bankruptcy to move to Texas. There are a few reasons the Court is skeptical of this argument. The first is one of timing. The NY DFS Letter was sent in April 2018, and the NRA filed its lawsuit over alleged interference with its banking and insurance relationships in May 2018. The speed with which the NRA sought relief by filing a complaint in the Northern District of New York and the delay in filing bankruptcy, over two years later, suggests the purpose of the bankruptcy was related to something else. Moreover, the general testimony was that financial reasons did not drive the bankruptcy filing. The Court understands how this might not fall into the category of current financial health when asking most people at the NRA, but even Mr. Spray, who was fully aware of the banking and insurance relationships, testified that he was not aware of any

¹⁰⁰ The NY DFS Letter is attached to NRA Exhibit 663.

¹⁰¹ *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 153:18-154:20.

¹⁰² *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 154:21-155:9.

reasons to file for bankruptcy. If the deterioration of banking and insurance relationships is an existential threat and an important reason for filing bankruptcy, one would think Mr. Spray would have been consulted, but he was not consulted on—or even informed of—the decision to file for bankruptcy.

With regard to receivership, there was no evidence to suggest that it was an imminent threat, and the witnesses only appear to have been concerned about receivership in the context of dissolution being granted. In other words, the witnesses appeared to be conflating the appointment of a receiver and dissolution when dissolution was the real concern. As far as the Court can tell, the appointment of a receiver was never requested by the NYAG in the NYAG Complaint or elsewhere. There was a statement in a press conference held by the NYAG that she may attempt to freeze assets,¹⁰³ but this comment appeared to relate to finding hidden assets and, in any event, none of the witnesses testified that this caused them concern that a receiver would be appointed. It is possible that if the NYAG had become aware that the NRA was preparing to file for bankruptcy, the NYAG could have attempted to have a receiver appointed on an expedited basis, but that would only be a reason for the NRA to go to extreme lengths to avoid leaks about its intention to file bankruptcy and not a reason for the bankruptcy filing itself.

Though articulated slightly differently, the remaining reasons for filing bankruptcy, such as preserving the NRA as a going concern, can be grouped under the general reason of avoiding dissolution in the NYAG Enforcement Action. Based on the statements of counsel and the evidence in the record, the Court finds that the primary purpose of the bankruptcy filing was to avoid potential dissolution in the NYAG Enforcement Action.

¹⁰³ NRA Exhibit 675.

Analysis of Whether the NRA Filed Bankruptcy to Achieve a Valid Bankruptcy Purpose

Having identified the purpose of the NRA's bankruptcy filing, the Court must now decide whether it was a valid purpose for bankruptcy such that the bankruptcy was filed in good faith. The Fifth Circuit Court of Appeals has offered guidance on how courts should approach the good faith inquiry:

Determining whether the debtor's filing for relief is in good faith depends largely upon the bankruptcy court's on-the-spot evaluation of the debtor's financial condition, motives, and the local financial realities. Findings of lack of good faith in proceedings based on §§ 362(d) or 1112(b) have been predicated on certain recurring but non-exclusive patterns, and they are based on a conglomerate of factors rather than on any single datum.

In re Little Creek Dev. Co., 779 F.2d 1068, 1072 (5th Cir. 1986).¹⁰⁴ The Third Circuit Court of Appeals has stated that almost every federal Court of Appeals follows some variation of this "totality of the circumstances" approach to the good faith filing requirement for Chapter 11 petitions. *In re 15375 Mem'l Corp.*, 589 F.3d 605, 618 n.7 (3d Cir. 2009). In that same case, the Third Circuit went on to note that they focus on two inquiries that are particularly relevant to the question of good faith: (1) whether the petition serves a valid bankruptcy purpose and (2) whether the petition is filed merely to obtain a tactical litigation advantage. *Id.* at 618.

The Court has great concern about this case because its purpose is to avoid dissolution that is being sought as a remedy in a state regulatory action. It has been asserted that this case is about preserving the NRA as a going concern, which is a very common good faith reason for filing bankruptcy. There is a difference, however, between a lawsuit in which a party seeks a monetary judgment that would pose an existential threat to a debtor and one where the attorney general of a

¹⁰⁴ The Fifth Circuit also identified several conditions that usually exist in filings that are not made in good faith. *Id.* at 1072-73. Because of the unusual circumstances of this case, the Court considered the *Little Creek* factors but did not structure its discussion around them.

state is specifically seeking dissolution of a debtor under the state's laws and therefore required to satisfy standards and requirements that specifically justify dissolution.

The New York Legislature constructed a regulatory system under which charities would be dissolved under certain circumstances. In this situation, the NRA is financially healthy, and the only way that the NRA will be dissolved is if it is determined in the New York court system that the requirements in Article 11 of the New York Not-For-Profit Corporation Law have been met. The NYAG has requested dissolution of the NRA under two different statutory provisions and acknowledged the high burden that it must meet:

But New York law does not allow the NYAG to summarily dissolve a charity, but rather place[s] a burden upon the NYAG to prove to a court that dissolution is called for under the law in a given circumstance.

With respect to N-PCL § 1101, the Attorney General must show a regulated entity's misconduct "has produced, or tends to produce, injury to the public. The transgression must not be merely formal or incidental, but material and serious, and such as to harm or menace the public welfare." *People v. Oliver Schools, Inc.*, 206 A.D.2d 143, 145 (4th Dep't 1994) (interpreting BCL § 1101, from which N-PCL § 1101 is derived) (quoting *People v. North River Sugar Refining Co.*, 121 N.Y. 582, 609 (1890)). . . .

With respect to Dissolution under N-PCL § 1102, the Attorney General stands in the shoes of the NRA's members and, as relevant here, must prove that the "directors or members in control of [the NRA] have looted or wasted the corporate assets, have perpetuated the corporation solely for their personal benefit, or have otherwise acted in an illegal, oppressive or fraudulent manner." N-PCL § 1102(a)(2)(D); 112(a)(7).

The State of New York's Omnibus Reply to Debtors' Opposition and the Committee's Response to Motion to Dismiss or Appoint a Trustee [Docket No. 459] at ¶ 17. A dissolution that requires this showing is not the type of dissolution that the Bankruptcy Code is meant to protect against. The Court is not in any way saying it believes the NYAG can or cannot make the required showing to obtain dissolution of the NRA, but the Court is saying that the Bankruptcy Code does not provide sanctuary from this kind of a threat.

For this reason, the Court believes the NRA’s purpose in filing bankruptcy is less like a traditional bankruptcy case in which a debtor is faced with financial difficulties or a judgment that it cannot satisfy and more like cases in which courts have found bankruptcy was filed to gain an unfair advantage in litigation or to avoid a regulatory scheme. The purpose of this bankruptcy filing may not have been to end the NYAG Enforcement Action immediately, but it was to deprive the NYAG of the remedy of dissolution, which is a distinct litigation advantage. This differs materially from the prescribed parallel proceedings structure for regulatory actions where regulators can obtain monetary judgments in one forum and then are required to have any claims treated through a bankruptcy process in that it is the NRA’s goal to avoid dissolution and subvert the remedy provided for under New York law entirely through this Chapter 11 case. The Court does not know what specific mechanism the NRA plans to use,¹⁰⁵ but its intention is clearly to “take dissolution off the table.”¹⁰⁶

Courts have consistently held that a bankruptcy case filed for the purpose of obtaining an unfair litigation advantage is not filed in good faith and should be dismissed. *See Antelope Techs., Inc. v. Lowe (In re Antelope Techs, Inc.)*, 431 F. App’x. 272 (5th Cir. 2011) (affirming dismissal for cause based on finding that “the purpose of the petition was not primarily to reorganize or respond to financial crisis but instead was to gain unfair advantage in the shareholder derivative action”); *Investors Group, LLC v. Pottorff*, 518 B.R. 380, 383-84 (N.D. Tex. 2014) (affirming dismissal of a bankruptcy case for being filed in bad faith based on a finding that the primary

¹⁰⁵ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 41:22-42:5 (Counsel for the NRA describing different ways in which a plan could be structured to achieve the NRA’s goal in this case).

¹⁰⁶ *Transcript of Hearing Held April 5, 2021* [Docket No. 497] at 49:23-25 (Counsel for the NRA: “We filed, again, for three reasons that constitute good faith. We needed to take dissolution, the equivalent of foreclosure, off the table. . . .”).

purpose for filing the bankruptcy petition was to gain an advantage in pending litigation); *In re Alexandra Trust*, 526 B.R. 668, 679-680 (Bankr. N.D. Tex. 2015) (citing cases).

Using the bankruptcy process to avoid dissolution in the NYAG Enforcement Action is also problematic because it deprives the state of New York of the ability to regulate not-for-profit corporations in accordance with its laws. There is a regulatory scheme for evaluating whether a New York charity should continue in existence under Article 11 of the New York Not-For-Profit Corporation Law. While bankruptcy courts can, in some circumstances, apply state regulatory law,¹⁰⁷ a bankruptcy case filed for the purpose of avoiding a regulatory scheme is not filed in good faith and should be dismissed. *See In re First Plus Fin. Enters., Inc.*, 99 B.R. 751, 755-56 (Bankr. W.D. Tex. 1989) (finding cause for dismissal under section 1112(b) because the case was filed in bad faith where “the obvious purpose in this case is to use the Chapter 11 filing as a litigation strategy and leverage in order to defeat the Texas regulatory scheme for the receivership and conservatorship of insolvent life insurance companies”); *In re Forest Hill Funeral Home & Mem’l Park-East, LLC*, 364 B.R. 808, 822-23 (Bankr. E.D. Okla. 2007) (finding cause for dismissal under section 1112(b) because the case was not filed in good faith for several reasons, including that it was filed to evade the regulatory authority of the state of Tennessee); *cf. Halo Wireless, Inc. v. Alenco Commc’ns Inc. (In re Halo Wireless, Inc.)*, 684 F.3d 581, 587-88 (5th Cir. 2012) (noting that section 362(a)(4) assists with the goal of discouraging debtors from submitting bankruptcy petitions either primarily or solely for the purpose of evading impending governmental efforts to invoke the governmental police powers to enjoin or deter ongoing debtor conduct that would seriously threaten the public safety and welfare).

¹⁰⁷ *See, e.g., In re HHH Choices Health Plan, LLC*, 554 B.R. 697 (Bankr. S.D.N.Y. 2016).

The Court would also like to discuss some of the NRA's other stated reasons for filing bankruptcy. The Court understands that the NRA wants to leave New York for a variety of reasons, not least of which being what it perceives to be a generally hostile environment. While the Court does not find that reincorporating in Texas was the true purpose of the bankruptcy filing, the Court would have concerns even if it were. Reincorporating in Texas could be accomplished outside of bankruptcy pursuant to applicable regulations for New York not-for-profit organizations,¹⁰⁸ which begs the question of what the Bankruptcy Code is being used for. If the goal is moving to Texas, the purpose of the bankruptcy would still appear to be avoidance of the regulatory scheme in New York that would be required for such a transition outside of bankruptcy, or at least avoidance of the New York regulators.

While the Court also does not find potential adverse judgments in litigation other than the NYAG Enforcement Action to have been a purpose for filing bankruptcy, the Court notes that based on the evidence, the NRA is financially healthy and potentially adverse litigation outcomes are too attenuated to justify a good faith bankruptcy filing. *See Off. Comm. of Unsecured Creditors v. Nucor Corp. (In re SGL Carbon Corp.)*, 200 F.3d 154, 163 (3d Cir. 1999) (holding that dismissal was appropriate where bankruptcy filing was based on litigation because the record was replete with evidence of the debtor's financial strength, there was no evidence that a judgment was imminent, and an assessment that pending litigation might result in a judgment causing financial and operational ruin was premature).

In closing arguments, counsel for the NRA raised several additional arguments that the Court would like to address. One of those arguments was that if avoiding dissolution is found to

¹⁰⁸ See Article 9 of the New York Not-For-Profit Corporation Law (governing merger or consolidation); Article 10 of the New York Not-For-Profit Corporation Law (governing non-judicial dissolution).

be an inappropriate bankruptcy purpose, this would allow a state to block a debtor's right to file for bankruptcy simply by filing an action seeking dissolution, and this would be tantamount to allowing a state to preempt federal law. This argument is based on the misconception that the state of New York has blocked access to bankruptcy relief just by filing a complaint with the word dissolution in it. The Court has not announced a *per se* rule that a pending dissolution action renders an entity ineligible for bankruptcy. Rather, the Court is evaluating the debtor's good faith or lack thereof in filing bankruptcy based on the totality of the circumstances of this specific case. The NRA is a solvent and growing organization using this bankruptcy as a tool to win its dissolution lawsuit, and that is not an appropriate use of bankruptcy.

Counsel for the NRA also, as the Court understands it, made the following argument. Section 1129(d) of the Bankruptcy Code states that the court may not confirm a plan over the objection of a governmental unit if the principal purpose of the plan is the avoidance of the application of section 5 of the Securities Act of 1933. Section 5 of the Securities Act of 1933 is an exercise of police power. Therefore, counsel argues, Congress has implicitly instructed that it is acceptable to file a bankruptcy petition for the purpose of avoiding any exercise of police power other than section 5 of the Securities Act of 1933. The Court does not understand this provision of the Bankruptcy Code to make such a sweeping endorsement of using bankruptcy for the principal purpose of avoiding the exercise of police power. Just because Congress has provided a guard rail for confirmation does not relieve the Court of its duty to conduct a fact-intensive inquiry to determine where a particular petition for bankruptcy relief falls along the spectrum ranging from the clearly acceptable to the patently abusive. *See In re 15375 Mem'l Corp.*, 589 F.3d 605, 618 (3d Cir. 2009) (discussing the duties of courts in examining whether bankruptcy petitions are filed in good faith).

Finally, the Court notes that even if it agreed with one or more of the NRA's arguments regarding eligibility or confirmation standards, the Fifth Circuit Court of Appeals has already given clear instruction to examine cases to determine whether they were filed in good faith and to dismiss those that were not. *See In re Humble Place Joint Venture*, 936 F.2d 814, 817 (5th Cir. 1991) ("Because *Little Creek* explicitly treated the question of good faith dismissals under § 1112, the case settles any statutory or constitutional question about that procedure.").

The Court finds, based on the totality of the circumstances, that the NRA's bankruptcy petition was not filed in good faith but instead was filed as an effort to gain an unfair litigation advantage in the NYAG Enforcement Action and as an effort to avoid a regulatory scheme. This constitutes cause for dismissal under section 1112(b)(1) of the Bankruptcy Code.

Consideration of the Appointment of a Trustee or Examiner

Having found cause for dismissal, section 1112(b)(1) requires that the Court now consider whether appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate. The appointment of a Chapter 11 trustee is an extraordinary remedy that requires a movant to meet their burden of proof by clear and convincing evidence. *In re Patman Drilling Int'l, Inc.*, 2008 Bankr. LEXIS 715, at *15-16 (Bankr. N.D. Tex. Mar. 14, 2008). As mentioned previously, there is nothing approaching a consensus from the parties on what should be done.

As counsel for the NRA acknowledged on the record, there were cringeworthy facts during this trial. The movants have presented evidence of the NRA's past misconduct. Some facts regarding the NRA's past conduct were not available to this Court because the NRA's former treasurer asserted his rights under the Fifth Amendment during large swaths of his deposition.

Some of the conduct that gives the Court concern is still ongoing. The NRA appears to have very recently violated its approval procedures for contracts in excess of \$100,000. Mr. LaPierre is still making additional financial disclosures. There are also lingering issues of secrecy and a lack of transparency. For example, even after hearing testimony from several witnesses, it is still very unclear why Mr. Spray, an officer everyone seemed to hold in high regard for his talent and integrity, parted ways with the NRA two weeks into this bankruptcy case. What is clear is that Mr. Spray's departure was precipitated by a call from Mr. LaPierre without involvement of the board of directors.

What concerns the Court most though is the surreptitious manner in which Mr. LaPierre obtained and exercised authority to file bankruptcy for the NRA. Excluding so many people from the process of deciding to file for bankruptcy, including the vast majority of the board of directors, the chief financial officer, and the general counsel, is nothing less than shocking.

The determination of whether appointment of a trustee or an examiner is in the best interests of creditors and the estate in this case, however, is complicated for a variety of reasons. The NRA has a mission that is, at times, political and polarizing. The NRA does not sell goods or services, and it would not be easy to find a suitable individual to serve in the role of trustee or examiner with expanded powers.¹⁰⁹

In an odd twist for a bankruptcy case, the NRA is financially healthy, and undisputed creditors are likely to be paid sooner in the ordinary course outside of bankruptcy than they would if they must wait for confirmation of a plan of reorganization. On the other hand, if a trustee or an

¹⁰⁹ The examiner that has been requested is one with expanded powers, including the power to "independently examine, and the extent necessary, remove management for cause."

examiner with expanded powers were appointed, the Court believes the members and other donors who provide financial support to the NRA may not continue to support the organization.

While there is evidence of the NRA's past and present misconduct, the NRA has made progress since 2017 with its course correction. Whether it is yet complete or not, there has been more disclosure and self-reporting since 2017. Both Ms. Rowling and Mr. Erstling, the NRA's Director of Budget and Financial Analysis, testified that the concerns they expressed in the 2017 Whistleblower Memo are no longer concerns.¹¹⁰ Mr. Frazer testified regarding the compliance training program that the NRA now has for employees.¹¹¹ Mr. Spray testified credibly that the change that has occurred within the NRA over the past few years could not have occurred without the active support of Mr. LaPierre.¹¹² It is also an encouraging fact that Ms. Rowling has risen in the ranks of the NRA to become the acting chief financial officer, both because of her former status as a whistleblower and because of the Court's impression of her from her testimony as a champion of compliance.

In short, the testimony of Ms. Rowling and several others suggests that the NRA now understands the importance of compliance. Outside of bankruptcy, the NRA can pay its creditors, continue to fulfill its mission, continue to improve its governance and internal controls, contest dissolution in the NYAG Enforcement Action, and pursue the legal steps necessary to leave New York. While the Court appreciates the way in which some of the parties have presented the appointment of an examiner as a compromise that could provide some benefits without taking too much control from the NRA, the Court finds that the reasons discussed above weigh against keeping this case in bankruptcy with the appointment of a trustee or an examiner. For these

¹¹⁰ *Transcript of Hearing Held April 23, 2021* [Docket No. 697] at 94:24-95:4.

¹¹¹ *Transcript of Hearing Held April 7, 2021* [Docket No. 700] at 26:15-28:1.

¹¹² *Transcript of Hearing Held April 13, 2021* [Docket No. 578] at 156:17-157:5.

reasons, the Court finds appointment of a trustee or an examiner would not be in the best interests of creditors and the estate.

Analysis of the Unusual Circumstances Exception Under Section 1112(b)(2)

The NRA did not allege unusual circumstances under section 1112(b)(2) of the Bankruptcy Code in their briefing but did discuss them during closing arguments at the conclusion of trial.

Section 1112(b)(2) states:

The court may not convert a case under this chapter to a case under chapter 7 or dismiss a case under this chapter if the court finds and specifically identifies unusual circumstances establishing that converting or dismissing the case is not in the best interests of creditors and the estate, and the debtor or any other party in interest establishes that—

(A) there is a reasonable likelihood that a plan will be confirmed within the timeframes established in sections 1121(e) and 1129(e) of this title, or if such sections do not apply, within a reasonable period of time; and

(B) the grounds for converting or dismissing the case include an act or omission of the debtor other than under paragraph (4)(A)—

(i) for which there exists a reasonable justification for the act or omission; and

(ii) that will be cured within a reasonable period of time fixed by the court.

While there are certainly unusual circumstances in this case, the Court does not find that they establish that dismissing the case is not in the best interests of creditors and the estate. This is true for many of the reasons discussed above. In addition, no party has established the requirement of section 1112(b)(2)(A). At trial, the Court was aware that the NRA intended to file a plan that would pay creditors in full, but the plan was not filed before the close of evidence. It was also clear from the evidence that the NRA could face substantial challenges in confirming a plan depending on how the NRA would be willing to structure it. The Court is aware that the NRA has now filed a plan of reorganization, but that plan was not offered into evidence and is not properly before the Court.

V. Conclusion

There are several aspects of this case that still trouble the Court, including the manner and secrecy in which authority to file the case was obtained in the first place, the related lack of express disclosure of the intended Chapter 11 case to the board of directors and most of the elected officers, the ability of the debtor to pay its debts, and the primary legal problem of the debtor being a state regulatory action. The Court agrees with the NYAG that the NRA is using this bankruptcy case to address a regulatory enforcement problem, not a financial one.

The Court finds that the NRA did not file the bankruptcy petition in good faith because this filing was not for a purpose intended or sanctioned by the Bankruptcy Code. Therefore, cause exists under section 1112(b) to dismiss this case, which the Court finds is in the best interests of creditors and the estate.

The Court is not dismissing this case with prejudice,¹¹³ but should the NRA file a new bankruptcy case, this Court would immediately take up some of its concerns about disclosure, transparency, secrecy, conflicts of interest of officers and litigation counsel, and the unusual involvement of litigation counsel in the affairs of the NRA, which could cause the appointment of a trustee out of a concern that the NRA could not fulfill the fiduciary duty required by the Bankruptcy Code for a debtor in possession.

IT IS THEREFORE ORDERED that the Motions to Dismiss are **GRANTED** and the above-captioned cases are dismissed without prejudice;

IT IS FURTHER ORDERED that the Examiner Motion is **DENIED** as moot; and

IT IS FURTHER ORDERED that the CRO Motion is **DENIED** as moot.

¹¹³ The movants did not request a prejudice period in their original Motions to Dismiss. While the NYAG did request dismissal with prejudice in a reply brief, it was not discussed in the body of the reply, and the NRA did not have an opportunity to provide responsive briefing to that request.

###End of Order###

EXHIBIT D

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

IN RE: . Case No. 21-30085-HDH-11
NATIONAL RIFLE .
ASSOCIATION OF AMERICA . Earle Cabell Federal Building
and SEA GIRT, LLC, . 1100 Commerce Street
Dallas, TX 75242
Debtors. . May 14, 2021
10:01 a.m.

TRANSCRIPT OF STATUS CONFERENCE
BEFORE HONORABLE HARLIN DeWAYNE HALE
UNITED STATES BANKRUPTCY COURT CHIEF JUDGE

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1 THE COURT: Good morning. This is the Bankruptcy
2 Court in Dallas in the National Rifle Association of America
3 case. I'll call the registrants first and then take
4 appearances by anyone else.

5 Mr. Neligan, Buncher, and Gaither?

6 MR. NELIGAN: Good morning, Your Honor; Pat Neligan
7 here with my partners, Doug Buncher and John Gaither.

8 THE COURT: Welcome back. Mr. Mason --

9 MR. NELIGAN: Thank you.

10 THE COURT: Mr. Mason and your group?

11 (No audible response)

12 THE COURT: Mr. Mason?

13 MR. GRUBER: Judge, this is Mike Gruber. I think Mr.
14 Mason is going to try and be on by phone. He had a child
15 procedure this morning, so he may be not on screen but he is
16 going to be calling in, I believe, too. And I think Joe is
17 going to be on; Joe Acosta.

18 THE COURT: Okay. Welcome back.

19 MR. GRUBER: Thank you.

20 THE COURT: Mr. Strubeck, Gluck, and Ms. Smith?

21 MR. STRUBECK: Yes, Your Honor. We're all here on
22 behalf of the Official Committee of Unsecured Creditors.

23 THE COURT: Welcome back.

24 Ms. Jackson --

25 MR. STRUBECK: Thank you.

1 THE COURT: -- and the Attorney General of D.C.?

2 MS. JACKSON: Good morning, Your Honor.

3 THE COURT: Welcome back.

4 Mr. Watson and Mr. Taylor?

5 MR. TAYLOR: Good morning, Your Honor; present and
6 accounted for.

7 THE COURT: Welcome.

8 Mr. Garman and Mr. Noall?

9 MR. GARMAN: Your Honor, we're here. We're back.
10 Thank you.

11 THE COURT: Welcome back, Mr. Garman.

12 Before we get into the status conference, let me just
13 say for the record that I know that every person, every party
14 that litigated the trial last month and received the order that
15 we issued on Tuesday has a level of disappointment. And I know
16 that some have a greater disappointment because every party
17 lost something.

18 And I honestly did not want to have this meeting with
19 you all today. I thought it might be better for us not to see
20 each other for a few more days, so just understand that I know
21 that. And as a lawyer, I have been in your position, so I --
22 you know, I don't think it helps very much for me to say this
23 on the record other than to let you know that I didn't
24 necessarily want to do this today just because I didn't think
25 it was good timing. But the Committee asked for it the next

1 day, and I thought to honor -- I try to honor y'all's requests
2 on things like that.

3 So that's why I went ahead and set it for today. It
4 wasn't to aggravate anybody or that sort of thing by just
5 bringing us all back together right after a ruling that I
6 understand would not go over well with some of your clients.

7 Mr. Strubeck, I'm going to let you have the --

8 MS. LAMBERT: Judge Hale?

9 THE COURT: Yeah.

10 MR. STRUBECK: Yes, Your Honor.

11 THE COURT: Oh, I'm sorry. I should have taken other
12 appearances, too.

13 Ms. Lambert, I saw you. I came in here to say that
14 and I called roll and then I said that. So I'm sorry. I
15 actually cut off probably Mr. Pronske's clients, too. So go
16 ahead, Ms. Lambert.

17 MS. LAMBERT: Your Honor, I think we all understand
18 how -- and anticipated that we're having -- making the kinds of
19 comments that the Court made and that saying everybody
20 appreciates that making decisions is difficult.

21 My name is Lisa Lambert, and I represent the United
22 States Trustee.

23 THE COURT: Thank you.

24 And does anybody else wish to make an appearance?

25 And I apologize for cutting off the other folks that I need to

1 take appearances from.

2 MR. WATSON: Good morning, Your Honor. Jermaine
3 Watson and Clay Taylor. I logged in late, so maybe you'd get
4 to us. But I wanted to make sure that --

5 THE COURT: Mr. Taylor --

6 MR. WATSON: -- we made our appearance on behalf of
7 Judge Journey.

8 THE COURT: Mr. Taylor answered for you. Glad to
9 have you with us, Mr. Watson.

10 MR. WATSON: Thank you, Judge.

11 UNIDENTIFIED SPEAKER: Good morning, Your Honor.
12 This is Caitlin (indiscernible) Partners, as well.

13 THE COURT: Welcome back.

14 MR. PRONSKE: Good morning, Your Honor. Gerrit
15 Pronske, Eric Van Horn, and Jason Kathman with Spencer Fane for
16 the New York Attorney General; and from the New York Attorney
17 General's Office, Jim Sheehan, Emily Stern, and Monica Connell.

18 THE COURT: Welcome back.

19 Anyone else wish to make an appearance?

20 (No audible response)

21 THE COURT: All right. What I just said still counts
22 as to the folks that just made an appearance. I think you all
23 heard that. Let's not drag that part out any further.

24 Mr. Strubeck's office asked on Wednesday morning if
25 we could get together to talk about how administrative expenses

1 that should be paid out of the estate are going to be handled
2 with the order that we just entered.

3 I would like to listen from you all and then stop and
4 take a break and visit with my law clerks rather than me do
5 some talking, although we've been scratching our heads a little
6 bit on this topic, too. So that's where we are, and that's
7 what I would like to accomplish this morning.

8 So, Mr. Strubeck, I'm going to give you the floor
9 first, but then anyone else that wishes to speak on this topic,
10 I'll gladly listen to.

11 MR. STRUBECK: Thank you, Your Honor. Again, for the
12 record, Louis Strubeck on behalf of Norton Rose Fulbright on
13 behalf of the Official Committee of Unsecured Creditors.

14 And, Your Honor, I take to heart your comments
15 earlier about the whole situation. And the reason for asking
16 for this conference was, you know, certainly not to reopen
17 wounds or to, you know, spend any time talking about
18 disappointments that might exist as a result of the Court's
19 ruling. I think Ms. Lambert summed up things pretty well. And
20 we appreciate and have always appreciated how difficult this
21 decision was from the Court's perspective. And, you know, at
22 least from the Committee's perspective, we understand Your
23 Honor's ruling.

24 But it created some uncertainties is probably the
25 best way for me to put it. I've been doing this a good while,

9

1 and I think this is the third time that I've been involved in a
2 major case that was dismissed. And it always creates
3 uncertainties around a number of different matters, not the
4 least of which involves how professional fees get handled.

5 And so in an attempt to try to get a little bit more
6 -- have an understanding as to how things might work here, Mr.
7 Neligan and I had kind of a series of discussions around some
8 of these issues, in part, Judge, because the Committee's
9 professionals have a couple of pending submissions involving
10 the payment of fees for prior months, and then we've got one
11 that hasn't yet made its way through the system. And I was
12 trying to figure out just how that might get handled and was
13 comforted by some statements from Mr. Neligan regarding the
14 NRA's intentions regarding the payment of those expenses.

15 But I think Mr. Neligan and I both wanted to make
16 sure that there was full transparency around all this, and we
17 certainly didn't want to do anything or agree to anything that
18 wasn't going to be discussed with the Court to make sure that
19 we weren't doing something that was different than what you
20 have in mind.

21 But there aren't really specific protocols for this
22 kind of thing. And, you know, having looked at the cases,
23 there certainly are cases that speak to the Court's continuing
24 jurisdiction for purposes of wrapping things up, like
25 administrative expenses once cases are dismissed.

1 And so, again, at least from the Committee's
2 standpoint, and there might have been other reasons for having
3 this status conference, there probably were. But we wanted to
4 kind of raise this issue about pending administrative expenses
5 for the Committee how Mr. Neligan and I had at least initially
6 discussed that those discussed might be taken care of. And in
7 this case, they'd be taken care of by having the NRA pay those
8 fees and expenses.

9 But we thought complete transparency was important.
10 And we didn't want to get ahead of the Court and wanted to
11 raise this issue with you to see if you might have some other
12 thoughts as to how it might best be handled.

13 THE COURT: Well, I appreciate it. And the only
14 topic I'm actually prepared, at least having thought about it,
15 Mr. Strubeck, is the issue that Ms. Smith asked for status
16 conference. So if folks pose other things, they may get me to
17 say -- I guess, I don't know, I haven't thought about that.
18 But that's what I would like to spend this, you know, hour on.
19 So I appreciate that.

20 Let's go a full circle of everybody that wants to say
21 something about this topic, and then we'll probably come back
22 to you, Mr. Strubeck.

23 MR. STRUBECK: Okay.

24 MR. NELIGAN: Your Honor, Pat Neligan on behalf of
25 the NRA. First, like other parties in this case, we certainly

1 would have preferred a different result. But I have to tell
2 you, and this is heartfelt and I think I speak for all the
3 lawyers on this call, we do truly appreciate the hard work and
4 the effort you and your staff gave to this case. I know it was
5 a difficult decision.

6 And, you know, I can also tell you that anyone who's
7 ever filed a case in your court knows just how professional and
8 responsive and just first-rate your team is. And I want to
9 thank you and thank them. As I said, we would have obviously
10 preferred a different result. But in any kind of litigation,
11 there are winners and losers, and we understand that.

12 With respect to the impact of your order dismissing
13 this Chapter 11, I think it is very clear under 349(b) of the
14 Bankruptcy Code that once the dismissal order is entered, the
15 Court effectively loses jurisdiction. And I've seen cases in
16 which courts have retained jurisdiction on specific matters.

17 But if you look at 349(b), the intent of Congress
18 with respect to a dismissal under 1112 is effectively to put
19 the parties back in their pre-bankruptcy position. And so,
20 absent an express sort of reservation of rights or
21 jurisdiction, this case for all intents and purposes is
22 dismissed.

23 Now from a very practical standpoint, I understand
24 that the Committee had submitted their first two invoices. I
25 understand they have been approved and no objections. And the

1 NRA's going to pay those. They had submitted their last
2 invoice, and they have been reviewed. And I think, you know,
3 from what I understand, there's no objection and the NRA would
4 honor and pay those expenses.

5 With respect to the vendors who were providing
6 services post-bankruptcy, the NRA has been paying those vendors
7 and, you know, will continue to do so. And if there's any kind
8 of dispute over a particular invoice with a vendor, we will
9 obviously just work it out like we would prior to the
10 bankruptcy.

11 Beyond that, I understand that, you know, the impact
12 of a dismissal, aside from just becoming effective of financial
13 to the order, is that as we put the company -- the NRA and all
14 the other parties into their pre-bankruptcy position, it means
15 that we need to go forward with payment of the unsecured
16 creditors on their pre-petition claims.

17 And by my last count, we had over 1,150 unsecured
18 creditors. Most of those creditors have invoices under
19 \$10,000. And the NRA is preparing to make those payments. Out
20 of an abundance of caution, we have not gone forward with those
21 payments until the status conference was held. But from our
22 perspective, 349(b) is very clear, and we'll simply move
23 forward with paying those creditors.

24 With respect to the litigation, you know, this puts
25 us in the pre-bankruptcy position. And accordingly, I

1 understand that with respect to the New York Attorney General,
2 the lawyers in the AG's Office and the lawyers at the Brewer
3 firm are working to move forward in that litigation in the
4 state court.

5 With respect to the litigation against Ackerman,
6 that's pending in front of Judge Fish. There have been several
7 motions filed recently in those cases or in that case. And
8 Judge Fish will -- you know, will rule on them accordingly.
9 There's really nothing today with respect to the Ackerman
10 litigation here in this bankruptcy.

11 And so having -- and understanding that 349(b) puts
12 all the parties in their pre-bankruptcy position, we're
13 prepared to go forward. And, you know, obviously, we would
14 have preferred a different result, but the bottom line is this
15 is a new and different case for the NRA. And we are prepared
16 to march forward and deal with the various claims and move
17 forward without any further ado in the bankruptcy.

18 THE COURT: Mr. Neligan, I don't want to get into
19 things between you and the other debtor professionals and your
20 client, for sure, so -- and I don't think you would answer it
21 that way anyway. But is there an intention of the NRA to pay
22 the debtors' side professionals, too?

23 MR. NELIGAN: Yes, Your Honor. You know, we will
24 submit our bills to our client. And if they have an issue with
25 them, we'll negotiate it and deal with that. But, again, under

14

1 349(b), the NRA is no longer in bankruptcy, but that doesn't
2 mean that it doesn't have to deal with these various claims.

3 And so I think, as Mr. Strubeck said, he and I have
4 discussed this, they've filed suit with the order on interim
5 compensation, and they will get paid. The debtors'
6 professionals will submit their bills to our client, and that
7 will be dealt with outside the context of this bankruptcy.

8 THE COURT: Okay. Thank you very much, Mr. Neligan.
9 That was helpful.

10 MR. GRUBER: Your Honor, this is Mike --

11 MR. GARMAN: Your Honor, it's -- it would be unusual,
12 but --

13 MR. GRUBER: Your Honor, this is Mike Gruber. Could
14 we get a word in also? I thought Mr. Garman had -- well, I'm
15 sorry. He hadn't had the chance to speak yet, so if he wants
16 to go, that's fine.

17 THE COURT: Yeah. I think --

18 MR. GARMAN: Your Honor, it is unusual to hear from
19 two lawyers from the debtor. Might you indulge me for one
20 minute?

21 THE COURT: I'm not indulging you, sir. You're
22 welcome to speak.

23 MR. GARMAN: Your Honor, I have nothing substantive
24 to add on the law. Mr. Neligan, I think, accurately identified
25 it. I think that absent amending the existing order, there is

1 finality and 349 has revested it. The NRA has received my
2 bills under the interim comp order.

3 But the reason I asked to speak was I do expect this
4 is probably the last time I'll appear before you, Your Honor.
5 And I did just want to say I'm very appreciative on behalf of
6 myself and my whole team for your Court and the professionals
7 in this case making us feel not only at home. But it was a
8 tough-fought battle, but a wonderful experience from a
9 professional standpoint.

10 And so I just, in what will likely be my last
11 appearance, want to say thank you to you, your staff, and the
12 other professionals.

13 THE COURT: Well, we may be having some more
14 conversations this morning, but let me just stop for the record
15 and say most of the folks that are on the screen right now are
16 people that will probably appear in front of me over the next
17 year. You may not, but your team and you are outstanding. And
18 I think you -- I hope you already knew that, but a great deal
19 of respect on this side.

20 MR. GARMAN: Thank you.

21 THE COURT: So thank you.

22 MR. GARMAN: Thank you, sir. Thank you.

23 MR. GRUBER: Your Honor, it might be a good time.

24 And I hate to do this, but I can't help but at this point join
25 in and say the same thing about the Garman team's

1 professionalism. And we traded some notes after the result and
2 everything, and we expressed our thoughts on that to Mr. Garman
3 and his team.

4 If I could just because as soon as the hearing or the
5 result of the hearing came down, we have been very busy this
6 week in our underlying case. And I think Mr. Neligan's team or
7 NRA litigation teams have to. We are trying to preserve a
8 September trial setting, and there's been a lot of activity on
9 that. This is the fourth court we've been brought into as a
10 result of litigation with the NRA and our clients. And so were
11 trying to preserve that setting.

12 And I say that because the -- we haven't finished
13 some research that we would like to see. And I understand
14 about a court losing jurisdiction and dismissal. That's what
15 we were -- we sought to do. But at the same time, courts do
16 maintain jurisdiction for certain things, including potential
17 payment of attorney's fees.

18 So I would disagree that the Court has lost
19 jurisdiction for all purposes. And we're exploring whether a
20 very expensive and unnecessary proceeding should result in some
21 payment to the parties that were involuntarily brought into a
22 bad-faith bankruptcy suit.

23 So we just wanted to say we haven't gotten to the
24 point of including research on that, but we don't want to allow
25 it to go unresponded to that, you know, the Court has no

1 jurisdiction to deal with this case, you know, based on the
2 dismissal, at least certain aspects that remain in the case.

3 THE COURT: Thank you.

4 Who wants to go next? I don't really have an order
5 after the Committee and debtor?

6 MR. TAYLOR: Your Honor, Clay Taylor on behalf of
7 Judge Journey, et al.

8 THE COURT: Go ahead.

9 MR. TAYLOR: First of all, just like the other
10 parties, I wanted to thank the Court and all its staff for the
11 way it conducted this trial. It was exceptionally well done by
12 the Court and the staff and working with all the other
13 professionals. I wish all of my experiences could go the same
14 way, albeit I would have liked a different result.

15 To that end, Your Honor, we should put the Court on
16 notice and the other parties that we are at least considering
17 the potential of filing an appeal. So I wanted to put that out
18 there that that is a possibility. And as such, you know, the
19 parties should probably act accordingly. That's not to say
20 that we're definitely going to do that, but we are considering
21 it.

22 We also think that perhaps Your Honor should consider
23 maybe amending its order to specifically retain jurisdiction to
24 hear things such as Mr. Strubeck's fee application to the
25 extent that is necessary. It sounds like maybe it's not. But

1 we were considering filing an application for allowance of an
2 administrative claim.

3 And maybe that's something similar to what Mr. Gruber
4 was talking about, but those are just our thoughts for the
5 Court to consider. And we didn't want to lay behind the law
6 and surprise anybody if we did file a notice of appeal.

7 THE COURT: Thank you for your comments, Mr. Taylor.

8 Anyone else wish to make comments before we circle
9 back to Mr. Strubeck?

10 MR. NELIGAN: Your Honor, this is Pat Neligan. I do
11 have a response to both -- to Mr. Gruber. But --

12 THE COURT: Okay.

13 MR. NELIGAN: -- I can wait until after Mr. Strubeck
14 speaks.

15 THE COURT: Why don't we -- everybody will get a
16 chance to speak again. Why don't we make the full circle to
17 see if anybody else wants to weigh in on the matter that we're
18 here for. It's the Committee's request, so anyone else that --
19 United States Trustee, did you want to say anything, Ms.
20 Lambert?

21 MS. LAMBERT: Judge Hale, the U.S. Trustee is
22 probably the one person in the room or the one entity in the
23 room that considers this issue all the time. And I think the
24 Court is aware that often when motions to dismiss or motions to
25 convert are filed, the professionals scramble to file their fee

1 applications or they scramble to get the time period under the
2 120 days shortened.

3 The U.S. Trustee also sometimes asks the Court to
4 retain jurisdiction when there are concerns about the fees in
5 the particular case. And we do that because of Kokkonen v.
6 Guardian Life Insurance, which holds that the Court cannot
7 enforce its own settlements under -- invoking inherent powers
8 once a case is dismissed. And that's 114 S.Ct. 1673.

9 So here, the U.S. Trustee did not ask that the Court
10 retain jurisdiction. No professionals filed motions or fee
11 requests before the time period expired. They were all
12 operating under the 8020 order. The U.S. Trustee has no
13 objection to their resolution of those issues outside of the
14 Court, as proposed by the counsel.

15 THE COURT: Thank you very much.

16 Does anyone else wish to weigh in on this topic
17 before we circle back to Mr. Strubeck and then we'll also
18 circle back then to Mr. Neligan for response to the other
19 comments?

20 (No audible response)

21 THE COURT: All right. Mr. Strubeck, I don't want to
22 put words in your mouth, but are you -- you're comfortable with
23 the arrangement that you and Mr. Neligan -- you have known each
24 other for 40 years almost if my count is right. Y'all have had
25 this discussion. Is this a comfortable solution to the

1 Committee?

2 MR. STRUBECK: Your Honor, I'm always happy to have
3 you put words in my mouth because those words end up better --
4 being better than the ones that I would utter myself. So no
5 exception to what you just said now.

6 And, Judge, you know, for sure, although I wish you
7 hadn't have said 40 years, but I have known Mr. Neligan for a
8 long time. And, you know, his word is gold as far as I'm
9 concerned. And so, you know, that arrangement is fine.

10 And, again, I think he and I -- we requested this
11 status conference.

12 THE COURT: Yeah.

13 MR. STRUBECK: And it was only for a very specific
14 issue, although I had a feeling that once Your Honor granted
15 it, you might hear from other parties that there maybe were
16 some other things to consider. But we just wanted to make
17 sure, Mr. Neligan and I did, that there was full transparency
18 here and that, for example, what he and I had talked about in
19 terms of the NRA's agreement to pay these fees were something
20 that was going to be okay with the United States Trustee and
21 Your Honor. I think we've heard from Ms. Lambert, and she's
22 fine with it.

23 To the extent there were issues with it, I probably
24 would have suggested to the Court that because your dismissal
25 order's not a final order yet, that maybe there could have been

1 some modifications to it. But I don't think that's necessary
2 with respect to the Committee's position here because we've
3 worked out an arrangement with the NRA where the Committee's
4 professional fees are going to get paid.

5 And so from our perspective, I don't think that we
6 need to do anything to the order or there's any further action
7 that really needs to be taken. Again, I've known Mr. Neligan
8 for a long time. And given his representations to the Court, I
9 don't think anything else is needed from the Committee's
10 perspective.

11 THE COURT: Thank you. And the 40-year comment
12 actually came -- you know, I learned on Friday night, January
13 15, I had drawn this case and that Mr. Neligan was one of the
14 lawyers involved. And so the first thing I did Monday morning
15 was go and look up in the Dallas Bar Association how long I had
16 known him. And it's not quite 40, but it is getting close to
17 40. So that's --

18 MR. STRUBECK: Right.

19 THE COURT: -- that's a sad, sad fact.

20 Mr. Neligan?

21 MR. NELIGAN: Yes, Your Honor. May I just state for
22 the record that I've know both you and Mr. Strubeck started
23 practicing law when we were five. So it adds up to almost 40
24 years. You know, at least with respect to both of you, you're
25 far younger than I am.

1 Let me -- and I concur with Ms. Lambert. There's an
2 excellent case I recommend anybody read with respect to the
3 dismissal of a bankruptcy under 1112 and the impact of 349(b)
4 of the Bankruptcy Code. And that's Westgate Nursing Home.
5 It's 518 B.R. 250.

6 And in that case, there was a motion to dismiss that
7 was granted by the court. After the motion to dismiss was
8 granted, the committee and the ombudsman and his law firm
9 requested that they be able to file fee applications. And in
10 that case, actually, there had been a number of sort of actions
11 by those parties to make -- try to make clear that they were
12 going to file their fee applications.

13 When they finally filed their applications, they also
14 filed a motion to amend the judgment. And the bankruptcy court
15 pointed out that under -- unlike other Code provisions, 349(b)
16 effectively puts the parties back in a pre-bankruptcy position,
17 and there was no further jurisdiction in that case. The U.S.
18 Trustee had reserved jurisdiction as part of their pleadings.
19 And so on certain issues, jurisdiction was retained.

20 But absent an express retention of jurisdiction under
21 349, the court pointed out that there is no ability, once
22 dismissed, for the bankruptcy court to do anything further.
23 And in that case, in particular, there was a motion to amend
24 the judgment. And the court pointed out that while judgements
25 or orders could be amended for technical defects or, you know,

1 to make clear or clarify a point, with respect to issues like
2 fee applications or fees or other issues that have been raised
3 today, that's essentially a new cause of action. And judgments
4 and orders were not intended to be amended to add causes of
5 action or remedies that weren't otherwise pled for in the
6 underlying pleadings.

7 All that said, I think your order is very clear. And
8 as the Westgate court pointed out, with respect to parties who
9 have administrative claims or other claims that might otherwise
10 be handled in bankruptcy, those parties have their rights under
11 state and federal law. And, you know, at this point, the
12 Ackerman litigation is proceeding in Judge Fish's court. And
13 Judge Fish has jurisdiction over that litigation, and Mr.
14 Gruber can seek whatever relief or remedies he wants in front
15 of Judge Fish.

16 But at this point, I think the -- your order was very
17 clear. And this case is dismissed.

18 THE COURT: Thank you, Mr. Neligan.

19 Anyone else wish to be heard? My intentions are, as
20 I said at the beginning, is to take a short recess with my law
21 clerks and either -- it may be that I don't have anything to
22 tell you, but at least come back out here and tell you I'm not
23 going to add to the conversation.

24 (No audible response)

25 THE COURT: All right. I want to take then -- it's

1 10:30. We should be back out here by 10:45 so if y'all could
2 just stand by.

3 (Recess at 10:30 a.m./Reconvened at 10:42 a.m.)

4 THE COURT: Okay. It looks like everybody's back,
5 and we're a couple of minutes early. Let me just say a couple
6 of things, and I think then we'll be done. What we've been
7 looking at since the Committee filed the request for the status
8 conference is the reasons whether there is a need to alter the
9 order to contemplate fee applications for the Committee's
10 professionals.

11 Based on the conversation that we had this morning
12 with the representations that were made, I don't see the need
13 to alter the order. There were two comments made about perhaps
14 doing some fee-shifting. And I want to make two observations
15 on that. One, that's not in front of me this morning.

16 And, second, the words "bad faith" were used this
17 morning in our discussions. I am not certain, but I don't
18 think that term actually appears in the opinion. It certainly
19 is not the reason that the case was dismissed. The case was
20 dismissed for lack of a bankruptcy purpose and lack of good
21 faith.

22 And I want everybody to know we spent a substantial
23 amount of time on distinguishing reasons for dismissing the
24 bankruptcy case. The reasons for dismissal of this case were
25 painstakingly made. We spent a lot of time trying to get it

25

1 right.

2 Thank you very much, Mr. Strubeck, for calling us
3 together, and I think it was productive. And y'all have a nice
4 weekend. We'll be in recess.

5 (Proceedings concluded at 10:43 a.m.)

6 * * * * *

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C E R T I F I C A T I O N

10 I, DIPTI PATEL, court approved transcriber, certify
11 that the foregoing is a correct transcript from the official
12 electronic sound recording of the proceedings in the above-
13 entitled matter, and to the best of my ability.

14

15 /s/ Dipti Patel

16 DIPTI PATEL

17

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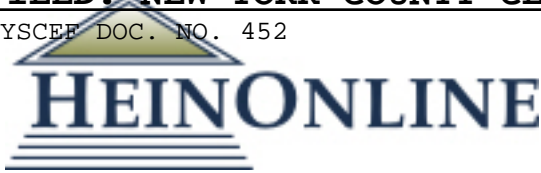
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AGLC 4th ed.

'Memoranda, Communications and Reports Rendered upon Applications for the Institution of Proceedings by the Attorney-General and in Response to Requests from Various Public Officers and Boards and Private Persons' [1914] 1914 New York Attorney General Reports and Opinions 217.

MLA 8th ed.

"Memoranda, Communications and Reports Rendered upon Applications for the Institution of Proceedings by the Attorney-General and in Response to Requests from Various Public Officers and Boards and Private Persons." New York Attorney General Reports and Opinions, 1914, 1914, p. 217-282. HeinOnline.

OSCOLA 4th ed.

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MEMORANDUM.

SPECIAL ELECTION DAY AS HOLIDAY.

Many inquiries have been received at the office of the Attorney-General as to whether or not Tuesday, April 7th, the day set for voting throughout the State upon the proposition of holding a Constitutional Convention, is a legal holiday. The matter is governed by statute and is perfectly clear. Section 24 of the General Construction Law as amended provides:

*"Holidays; half holiday.—The term includes the following days in each year * * * each general election day * * *."*

The Election Law defines "General Election" day in Section 3 as follows:

"The term 'general election' means the election held on the Tuesday next succeeding the first Monday in November."

Chapter 819 of the Laws of 1913 providing for the election itself everywhere speaks of this election as a special election.

Tuesday, April 7, 1914, is therefore not a legal holiday under the laws of this State.

Dated April 1, 1914.

THOMAS CARMODY,
Attorney-General.

QUO WARRANTO — BOARD OF HEALTH — CITY OF GENEVA.

Although the rulings of the Attorney-General have been to the effect that the general provisions of the Public Health Law prevail over the special provisions of city charters in the appointment of boards of health, yet where there are two bodies claiming office respectively under the general law and the Geneva City charter, no public interest prevents the permitting of an action to test title to the offices.

Application granted.

Report to the Attorney-General in the Matter of the Application of Gardner B. Young and others for the commencement of an

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action of quo warranto against Reuben H. Culvin, William S. Moore, Robert A. Whiting, George E. Gasper, Frank A. Greene, Jay B. Covert and Frank K. Hardison.

REPORT.

STATEMENT.

The applicants allege that they are members of the Board of Health of the city of Geneva, appointed by the mayor under the charter of the city, which is chapter 360 of the Laws of 1897 and its amendments. The respondents are exercising the duties of the board of health under appointment in pursuance of section 20 of the Public Health Law, passed in 1913.

APPEARANCES.

On April 1, 1914, Mr. Smith O'Brien appeared for applicants and Mr. Nathan D. Lapham for the respondents.

OPINION.

There is thus presented the question of an apparent conflict between the general provisions of the Public Health Law with regard to boards of health in certain cities, and the charters of such cities which provide boards of health otherwise constituted than as is required in the Public Health Law. This question has frequently been presented to this office, and while the rulings have been to the effect that the general law prevails, nevertheless, the question is not free from difficulty and can be decided finally only by an action of quo warranto such as the applicants desire to have brought. (Attorney-General's Report, pages 490, 664.)

RECOMMENDATION.

As there is no public interest adverse to the commencement of such action, I am of the opinion that permission should be granted as requested, upon the usual conditions.

Dated April 1, 1914.

HENRY SELDEN BACON,
Second Deputy Attorney-General.

Application granted by Attorney-General on Report, April 1, 1914.

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CORPORATIONS — DISSOLUTION — CRANBERRY LAKE RAILROAD.

Institution of action authorized to annul a corporation where such corporation has failed to exercise its powers.

Report to the Attorney-General in the Matter of the Application of Charles E. Bates for the institution of an action to dissolve the Cranberry Lake Railroad Company.

REPORT.

STATEMENT.

A hearing in this matter was had at the office of the Attorney-General in Albany on March 27, 1914. Proofs were submitted in documentary form and argument was had.

Cranberry Lake Railroad Company is a duly organized railroad company, under the laws of the State of New York, operating a line of steam railroad extending from Benson's Mines on the line of the New York Central and Hudson River Railroad Company to Wanakena, a distance of about six miles, and all in the county of St. Lawrence and State of New York.

Of late years the railroad company has neglected and failed to operate passenger and freight trains to the satisfaction of the public, and has almost wholly omitted to operate said trains. The lack of operation was due to the fact that the resources of the country have been largely exhausted, and the railroad was constructed for and operated in the delivery of the products of the country to market, such products consisting of lumber and the various products therefrom.

APPEARANCES.

Charles F. Bates, Petitioner, in person.

William R. Ventries, Petitioner, in person.

H. C. Rich, President of Cranberry Lake Railroad Co.

J. P. Quigley, Attorney for Respondent.

OPINION.

I have submitted the question to the Public Service Commission of the Second District of the State of New York, and they interpose no objection to the institution of an action. I see no reason why the public would be injured if this application were granted, and all parties connected with the road and its operation seem to be interested to have the action brought.

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I believe the conditions described present a situation where the institution of an action is proper.

It does not appear that the suspension of the business of this corporation has existed for a period of one year. It would therefore be preferable to apply to the court for leave to institute an action under section 131 of the General Corporation Law to annul the corporation.

RECOMMENDATION.

I therefore recommend that leave of the court be applied for, for the institution of an action under section 131 of the General Corporation Law to annul the corporation.

Dated April 3, 1914.

J. A. KELLOGG,
First Deputy Attorney-General.

Application granted by Attorney-General on Report, April 3, 1914.

MEMORANDUM.

USE OF THE STATE SEAL AND COAT OF ARMS BY CORPORATIONS
AND PRIVATE PERSONS.

The right of corporations and private persons to use the Seal or the Coat of Arms of the State upon stationery and for advertising purposes has been presented to this department many times. Such practices have been uniformly disapproved by this Department during the last thirteen years. (See Letter Books, 61, page 342; 66, page 690; 69, page 380; 122, page 860; 197, page 967.)

What is now section 887, subdivision 1 of the Penal Law provides:

“ § 887. *Forgery in second degree.* A person is guilty of forgery in the second degree, who, with intent to defraud:

1. Forges the great or privy seal of this state, the seal of any court of record, or of any public office or officer authorized by law, or of any body corporate created by or existing under the laws of this state, or of the United States, or of any other state or any territory of the United States, or of any other state, government, or country, or any impression of such a seal; or any gold or silver coin, whether of the United States, or of any foreign state, government or country; or,”

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Section 881, subdivision 1 also provides:

“ § 881. *Uttering forged instruments is forgery.* A person who, knowing the same to be forged or altered, and with intent to defraud, utters, offers, disposes of or puts off as true, or has in his possession, with intent so to utter, offer, dispose of, or put off:

1. A forged seal or plate, or any impression of either; or,”

The Election Law forbids the use of the Coat of Arms of the State as a party emblem. (Section 124.) Section 60 of the Public Officers Law requires that generally the seal of State officers shall bear the Coat of Arms. In article 6 of the State Law the Arms of the State and the Seal of the State are described. Sections 44 and 45 of the General Construction Law deal respectively with the use of private and corporate seals. Section 421 of the Penal Law relative to misleading advertisements does not seem to have any particular application.

A reading of the statutes referred to fails to show that the private use of the Coat of Arms and Seal is prohibited with any exactitude. Nevertheless I am constrained to formally disapprove of any such use. The Coat of Arms and the Seal of the State are the property of the State and necessarily are intended to be used only for the purposes set forth in our law. The use of copies of the Seal and of the Coat of Arms by private persons and corporations can serve no purpose, except to give a fictitious authority to their acts or status and in many cases would lead to outright fraud. A State bank derives no special authority justifying such use.

Some time ago the Superintendent of Banks was officially interested in the sale of certain real property in which certain banks taken over by him were involved. In that case the Superintendent of Banks used the Coat of Arms of the State in certain newspaper advertising of the sale. The obvious purpose of this was to indicate the interest which the State had acquired in the transaction and to give to it an authority and standing different than a sale conducted by private persons or corporations.

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Nothing suggests itself to me which would justify the use of the Coat of Arms or Seal of the State by corporations or by private persons.

Dated April 6, 1914.

THOMAS CARMODY,
Attorney-General.

To Mr. T. C. WILLIAMS, *Cashier, Rushville State Bank, Rushville, N. Y.*

MEMORANDUM.

SCOPE OF THE AMENDMENT TO SECTION 273-a OF THE TAX LAW
AFFECTING STOCK TRANSFERS.

On July 19, 1913, I advised the Comptroller that this section, 273a of the Tax Law, as it then stood, applied only to such corporations as maintained, within the State of New York, a transfer office or other place aside from its principal office or place of business, for the sale, transfer or delivery of its stock. (See Attorney-General's Report 1913, vol. 2, page 469.) However, by the amendment of chapter 206 of the Laws of 1914, the scope of this section has been greatly extended. There can be no mistake as to its meaning. It, in terms, applies to:

"Every person, firm, company, association or corporation engaged in whole or in part in the making or negotiating of sales, agreements to sell, deliveries or transfers of shares or certificates of stock, or conducting or transacting a stock brokerage business, *and* every stock association, company or corporation which shall maintain a principal office or place of business within the state *or* which shall keep or cause to be kept within the state of New York a place for the sale, transfer or delivery of its stock."

It matters not what business the corporation is engaged in, provided it either maintains a principal office or place of business within the State of New York, or keeps therein a place for the sale, transfer or delivery of its stock.

Dated April 25, 1914.

THOMAS CARMODY,
Attorney-General.

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QUO WARRANTO — HEALTH OFFICER, CITY OF AMSTERDAM — APPOINTMENT.

At a first meeting of a city board of health there was an attempt to appoint a health officer not eligible under the civil service rules. At a second meeting, it is contended that the same person was appointed after proper qualification, but through error the appointment was not published in the "official minutes." *Held* that this raises a question of fact entitling the alleged appointee to commence an action to oust a person appointed a year later and within the statutory term of the claimant.

Application granted.

Report to the Attorney-General in the Matter of the Application of JAMES S. WALTON to the Attorney-General of the State of New York petitioning him for leave to bring an action in quo warranto against HORACE M. HICKS, to test the title to the office of Health Officer of the City of Amsterdam.

REPORT.

APPEARANCES.

J. D. Dealy, Esq., for petitioner.

Ambrce P. Fitz-James, Corporation Counsel for respondent and the Board of Health of the city of Amsterdam.

C. S. Nesbit, Esq., of counsel.

FACTS.

It was conceded on the presentation of this application that really the only question was, whether or not an appointment of a Health Officer for the city of Amsterdam was made at a meeting of the Board of Health of that city held on the 9th day of April, 1913.

It appears that for some years previous to 1913 it had been the practice in the city of Amsterdam to have an annual meeting of the board of health in the month of March for the purpose of organization and, among other things, the appointment of a health officer. At these annual meetings, previous to the year 1913, a health officer was appointed for a term of one year, the board of health apparently not taking cognizance of the Public Health Law of the State, which fixed a different length of term, there being no provision of the city charter of the city of Amsterdam as to the length of term of the health officer.

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On the 12th day of March, 1913, at the annual meeting of the board of health, Dr. James S. Walton was appointed health officer and for the first time in several years the appointment was for the statutory term. For some time the rules and regulations of the Civil Service Commission of the city of Amsterdam had classified the health officer in the noncompetitive class but in 1912 the rules were amended and the health officer was placed in the competitive class so that at the time of the meeting of the board of health on the 13th day of March, 1913, the health officer was classified in the competitive class and at that time Dr. James S. Walton was not qualified under the rules of the Civil Service of the city of Amsterdam for the office of health officer.

Shortly after the meeting on March 12, 1913, the corporation counsel of the city of Amsterdam called attention to the fact that Dr. Walton was not eligible by reason of the fact that he had not complied with the requirements of the Civil Service Law. The next meeting of the board of health was held on the 9th day of April, 1913, it being the regular monthly meeting of the board of health. At that meeting there was presented a certificate of the Civil Service Commission certifying that Dr. Walton had taken a Civil Service examination and had obtained a standing of 98 per cent. and was eligible for the office of health officer. It is claimed on behalf of petitioner, who presents his own verified petition, the affidavit of J. H. Dealy, the then mayor and presiding officer of the board of health, the affidavit of Thomas F. Monaghan, the then Secretary of the board of health, the affidavit of James W. Horey, the sanitary inspector of the Department of Health, and the affidavit of George A. Norton, assistant sanitary inspector of the Department of Health, that they were all present at the meeting of the board of health on the 9th day of April, 1913, and that at said meeting a resolution was passed appointing Dr. James S. Walton health officer for the term provided by law.

This is the fact about which the dispute arose. It seems that it had been the practice in the city of Amsterdam for the secretary of the board of health to take rough notes of the proceedings and then to write them out at length and they were then published in a newspaper, and a clipping made from the newspaper containing the minutes as published in the newspaper was pasted in a book

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and at the next meeting the printed slip was approved and they were known as the official minutes. The official minutes, so-called, for the meeting held on the 9th do not contain any mention of a resolution appointing a health officer. The secretary's explanation of this failure is that though he noted on the back of the certificate from the Civil Service Commission the following: "Motion Wind 2nd Noonan Walton app. H. O. for statutory term," that the interpretation of this was that Dr. Josef Windbiel, who was a member of the board of health, had made a motion which was seconded by John Noonan, another member of the board of health, appointing Dr. Walton to the position of health officer for the term provided by law, and that in writing out his minutes for publication of that meeting he overlooked this and failed to write it out and send it to the printer and that is the reason why it did not appear in the minutes that were published in the newspaper.

It appears that by a certificate dated April 9th the President of the Board of Health certified to the Civil Service Commission of the city that Dr. Walton had been appointed at the meeting held on the 9th of April, 1913. It is conceded that Dr. Walton acted as health officer until some time in January, 1914, when the city administration changed as a result of the election in the fall of 1913; that after the coming in of the new administration the membership of the board of health of the city of Amsterdam was increased from six to ten and the new board of health assumed to appoint Dr. Horace M. Hicks, Health Officer, and that since the appointment of Dr. Hicks he has been recognized by the city administration as the health officer and that they decline to recognize Dr. Walton.

The only thing presented in opposition is the affidavit of Mr. Fitz-James, the Corporation Counsel, that he had interviewed several of the members of the Board of Health in office at the time of the meeting on April 9, 1913, and that they had stated to him that they had no recollection of such a resolution having been passed at that meeting. There were presented no affidavits of any of the members of the board of health or of any persons who were present at the meeting held on the 9th day of April, 1913. It was practically conceded on the argument that if Dr.

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Walton was legally appointed at the meeting held on the 9th of April, 1913, that he was entitled to hold office for the statutory term.

CONCLUSION.

I can find no statutory provision requiring local boards of health to keep minutes of their proceedings. In fact there seems to be no requirement of the present Health Law, or of the Health Law in effect in April, 1913, even requiring that there be a secretary of a city board of health. However, it has, no doubt, for a long time been the practice of local boards of health to have secretaries and to keep some sort of minutes of their proceedings.

While, in my opinion, such minutes as were kept of the meeting held on the 9th of April, 1913, would be some evidence and perhaps might raise a presumption, yet they are not conclusive and can be disputed, and in view of the positive affidavits presented, that Dr. Walton was appointed at such meeting, together with the various circumstances, such as the certificate of the Municipal Civil Service Commission with the notes on the back of it, the notification given to the Civil Service Commission of his appointment and his acting during the year 1913 and being recognized by the board of health as the health officer, all raise a strong question of fact.

No positive evidence was presented in opposition. It, therefore, seems to me that the evidence presented is sufficiently strong to justify the conclusion that it is probable that the petitioner would be able to establish the fact that he was appointed at the meeting held April 9, 1913, before the proper tribunal.

I am, therefore, of the opinion that this application should be allowed.

Dated April 30, 1914.

JAMES A. PARSONS,
Deputy Attorney-General.

Application granted by Attorney-General on report May 1, 1914.

MEMORANDA, COMMUNICATIONS AND REPORTS. 227

THE KINGS COUNTY JUDGES.

Before the Attorney-General in the Matter of the Application of WILLIAM H. SNYDER for permission to bring an action against JOHN F. HYLAN and ROBERT H. ROY in the nature of quo warranto to oust the said JOHN F. HYLAN and ROBERT H. ROY from the offices of County Judges of Kings County.

The above entitled application for leave to bring a quo warranto action for the purpose of testing the title of Mr. Roy and Mr. Hylan to the offices of County Judges of the county of Kings under the appointment made by the Governor, having been brought to a hearing April 27, 1914, at the New York office of the Attorney-General, before Deputy Attorney-General William A. McQuaid, at which time appearances were made as follows:

Harry E. Lewis and Hugo Hirsh, Esqs., attorneys for petitioner, 215 Montague street, Brooklyn, N. Y.

Charles J. McDermott, Esq., attorney for respondents, John F. Hylan and Robert H. Roy.

David Hirshfield, Esq., for the Brooklyn tax payers.

After due and careful consideration of the statements made at such hearing and the briefs and memoranda submitted on both sides,

I do hereby order and direct that the application be and the same hereby is granted, the action to be prosecuted in conformity with the rules established by this office, a copy of which rules is hereto annexed, and a bond in the penal sum of \$500 to cover costs to be furnished by the applicant before action is commenced.

Dated, Albany, May 16, 1914.

THOMAS CARMODY,
Attorney-General.

No report was rendered upon this application, the Attorney-General acting upon the papers and evidence submitted at the hearing.

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DISSOLUTION — FREDONIA NATURAL GAS COMPANY — SUSPENSION OF BUSINESS — FRANCHISES.

A natural gas company by reason of failure of supply of gas was forced to suspend operations and now upon making arrangement for additional supply intends to resume operation and in competition with another company. *Held*, that this suspension did not warrant the bringing of an action to dissolve the corporation, as the suspension arose involuntarily. *Held* that the application to forfeit certain franchise rights should be denied pending the outcome of certain litigation.

Report to the Attorney-General in the Matter of the Application of the VILLAGE OF FREDONIA for the commencement of an action by the ATTORNEY-GENERAL of the State of New York in the name of the PEOPLE OF THE STATE OF NEW YORK against FREDONIA NATURAL GAS LIGHT COMPANY, for the purpose of procuring a judgment dissolving the said Corporation and forfeiting its corporate rights, privileges and franchises.

Report to the Attorney-General in the Matter of the Application of the VILLAGE OF FREDONIA for the commencement of action by the ATTORNEY-GENERAL of the State of New York in the name of the PEOPLE OF THE STATE OF NEW YORK, against FREDONIA NATURAL GAS LIGHT COMPANY, for the purpose of procuring a judgment decreeing to be null and void, a certain franchise grant given by the VILLAGE OF FREDONIA, N. Y., to ELIAS FORBES, under date of February 29, 1864.

REPORT.

STATEMENT.

These are separate applications made by the Village of Fredonia for the commencement of two actions by the Attorney-General, one to dissolve the Fredonia Natural Gas Light Company, and the other to declare null and void a certain special franchise granted to one Elias Forbes.

The applications were heard together and as they are dependent in a great measure upon the same facts may very properly be treated together.

APPEARANCES.

Mr. Louis L. Thrasher, for petitioner, Village of Fredonia.

Mr. George Clinton, Jr. (Mr. Henry W. Killeen, of counsel), for Fredonia Natural Gas Light Company.

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FACTS.

On February 29, 1864, the Village of Fredonia, by resolution, granted unto Elias Forbes and Preston Barmon, a franchise granting to them the privilege of laying their gas pipes and other machinery underground along or across any or all of the streets, lanes or alleys of said village.

The Fredonia Natural Gas Light Company was incorporated March 31, 1865. The term of its corporate existence is fixed in its certificate at fifty years, and I am advised that on March 10, 1914, pending this application its corporate existence has been extended for fifty additional years.

The Forbes franchise was transferred to the Fredonia Natural Gas Light Company and it operated under its provisions for many years. The supply of natural gas accessible to it having become exhausted it proceeded to the manufacture of gas from coal and furnished the gas so manufactured through the pipes previously used in furnishing the natural gas to the citizens of Fredonia. In November, 1905, the Frost Gas Company was granted a franchise, and some time thereafter entered upon the distribution of gas in the Village of Fredonia in competition with the Fredonia Natural Gas Light Company. The Frost Gas Company had access to a natural gas supply and under the provisions of its franchise it was obliged to furnish the same for not more than thirty-two cents per thousand cubic feet to individuals and private corporations and to the village as a municipality for not to exceed twenty cents per thousand cubic feet. When the Frost Gas Company became thoroughly established it succeeded, on account of its access to the natural gas supply, and its consequent ability to furnish gas at a much cheaper rate, in driving the Fredonia Natural Gas Light Company, which was compelled to manufacture its gas from coal, out of the field, the Frost Gas Company furnishing the supply as low as twenty-seven cents per thousand feet. As a result the Fredonia Natural Gas Light Company has not furnished customers with gas since April, 1911. Now, however, the Fredonia Natural Gas Light Company has made arrangements with an allied corporation, the South Shore Natural Gas & Fuel Co., which has connections with recently opened gas fields, and therefore being able to supply natural gas, desires to re-engage in the busi-

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ness. During the time which has elapsed since it ceased furnishing gas the Fredonia Natural Gas Light Company has continued its corporate existence, has held its regular meetings and has paid its annual taxes upon its special franchises. Its cessation of business was evidently involuntary, due to the fact that the other company on account of its accessibility to the gas fields was able to obtain all of its customers. At the time that the Frost Gas Company entered the field which had been occupied by the Fredonia Natural Gas Light Company for at least thirty years there was no law requiring it to obtain permission from any public board before entering upon such competition. The Fredonia Natural Gas Light Company was by many years the earlier occupant of the territory. It now seeks to resume its operations. A steam heating plant which furnishes many public institutions is controlled by the same parties that control the Fredonia Natural Gas Light Company, and desires now to be connected with its gas mains, and the Fredonia Natural Gas Light Company desires to furnish other customers should opportunity present itself.

It is claimed that the laying of mains will injure shade trees and that the pipes of the Fredonia Natural Gas Light Company are not sufficient to withstand the pressure of the supply which it is proposed to force through them. I think from the evidence that it is established that the mains may be laid without injuring shade trees, and there is no sufficient evidence to establish that the pipes are insecure and cannot properly furnish the gas supply. These matters, of course, could be reasonably regulated by ordinance.

The Village of Fredonia has instituted an action in the Supreme Court to restrain the Fredonia Natural Gas Light Company from opening the streets for the purpose of laying additional gas pipe lines and "from exercising or attempting to exercise any rights under the Forbes franchise."

An application for the extension pending the action of a temporary injunction in this action was denied at Special Term by Mr. Justice Wheeler in January of the current year. (*Village of Fredonia v. Fredonia Natural Gas Light Co.*, 145 N. Y. Sup. 820.) The Special Term held that the franchise was valid and that the Fredonia Natural Gas Light Company was entitled to

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operate under it. In the Appellate Division, however, in March, this order was reversed and it was held:

“that there is sufficient doubt as to the law and facts involved, respecting the right of the defendant to lay its pipes as proposed, to require the reinstatement of the preliminary injunction until the hearing and determination of the action.” (146 N. Y. Sup. 1116.)

By virtue, therefore, of the pendency of the action brought by the Village of Fredonia against the Fredonia Natural Gas Light Company, the latter is restrained from exercising any rights under its franchise, which has already been held at Special Term to be valid and effective.

CONCLUSIONS AND RECOMMENDATIONS.

It is quite apparent from the foregoing that the Fredonia Natural Gas Light Company is anxious to resume its original activities which were interrupted by competition which it could not meet and which has for a period of something more than two years prevented it from doing business. The application to institute an action to dissolve the corporation is based upon section 101 of the General Corporation Law, subdivision 3, which provides that such action may be maintained against a corporation where it has suspended its ordinary and lawful business for at least one year. The manifest purpose of this section is to permit the Attorney-General in his discretion to institute an action to destroy the corporate life of a company which for that period of time has neglected to discharge its ordinary business, but I think that it is foreign to the purpose of this legislation to institute such an action where the company has involuntarily been forced through competition, which it cannot meet, to suspend its operations until it can make arrangements to resume business under favorable circumstances. The purpose of the law would seem to require a wilful nonuser. (*People v. Milk Exchange*, 133 N. Y. 565.)

It appears from the papers and proceedings that the actual cause of the complaint is not so much because the Fredonia Gas Light Company has ceased to transact its ordinary business, but because it is now proposing to resume such business. This is not a condition within the contemplation of the law in my judgment,

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for the exercise of the discretion of the Attorney-General to bring an action to destroy the life of this company.

So far as this application to bring an action to dissolve the corporation is concerned, I recommend that it be denied.

The allied application to forfeit the Forbes franchise for non-user presents a somewhat different question. It is a question which is before the court in the action brought by the Village of Fredonia. The decision made in that action will undoubtedly dispose of the question as to whether or not this franchise is valid or whether it has been lost by nonuser. I think, therefore, it would perhaps be improper to express any opinion upon this question which is before the proper tribunal for determination. While this action is pending the village having obtained a temporary injunction prohibiting the Fredonia Natural Gas Light Company from exercising its franchise pending the action, I cannot see any proper purpose which would be gained by instituting another action in the name of the People. I think it would complicate rather than clarify the issue. It may possibly be that in this action the complaint will be dismissed upon the ground that the village has no right to maintain the action and that the action can only be maintained in the name of the People. In this event, which I consider rather remote, this matter could very properly again be considered with the benefit of the light which would be thrown on the facts and the law by the decisions of the courts in the action pending.

As to this application, therefore, to institute an action to declare null and void the special franchise granted to Elias Forbes, I recommend that the application be denied, with permission to the plaintiff to renew the same upon the papers already on file and such additional papers as it may be advised, in case it shall become necessary by reason of any decision made in the action of the Village of Fredonia against the Fredonia Natural Gas Light Company in order to fully determine the rights of the parties that an action should be instituted in the name of the People of the State of New York.

Dated, May 18, 1914.

J. A. KELLOGG,

First Deputy Attorney-General.

Applications denied by Attorney-General on report May 19, 1914.

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QUO WARRANTO — TOWN SUPERINTENDENT OF HIGHWAYS — VOID BALLOTS —
QUALIFICATION OF OFFICER.

The petitioner received 121 votes and the respondent 119 votes for town superintendent of highways. It was not determined whether or not two of the ballots cast for the petitioner were invalid, but he was never notified of his election. Thereafter the town board declared the office vacant by failure of the petitioner to qualify and the respondent was appointed. *Held* that the petitioner should be granted leave to bring an action to test the title of the respondent.

REPORT.

STATEMENT.

This is an application to the Attorney-General for leave to bring an action in quo warranto to test the title of William P. Keator to the office of Town Superintendent of Highways of the Town of McDonough in the County of Chenango. The petitioner is Eyra L. Preston who claims he was elected to the office in question at the biennial town meeting held in said town on February 11, 1913. The evidence taken is not disputed in any material respect.

FACTS.

The petitioner and respondent were the only candidates for the office of Town Superintendent of Highways at the aforesaid election, their names appearing on the Republican and Democratic tickets, respectively. The election was conducted by the four Justices of the Peace of the town. The petitioner voted and was present all day at the election. Immediately following the canvass of the votes cast, the election officers certified that 240 votes had been cast for the office of Town Superintendent of Highways, of which 119 had been cast for William P. Keator, the respondent, and 121 for the petitioner, but that two of the ballots cast for the petitioner had been protested as void. Upon the same or the following day the election officers filed in the Town Clerk's office the above mentioned certificate and a further certificate to the effect, among other things, that the petitioner and respondent had each received 119 valid votes for the said office; that the petitioner had received two more votes than the 119 valid votes counted for him, and that these two votes had been protested as void "to be taken care of at an adjourned meeting of the Board." The two pro-

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tested ballots were marked with a cross in a circle above the Republican ticket, and also with a cross in the circle above the Prohibition ticket. The Prohibition ticket contained no nomination for the office in question. There was no evidence given that the petitioner had ever been notified of his election, and the proof is that no notice was given.

The term of Town Superintendent of Highways of this town commenced on the 1st day of November, 1913. On March 1, 1913, the petitioner filed in the Town Clerk's office of the Town of McDonough his oath of office, which seems to answer the statutory requirements. The fact that the signature of the notary public on this oath is not in a direct line above the title of his office, but is practically under the signature of the affiant, would seem to be an immaterial informality.

On March 1, 1913, the petitioner presented to the Supervisor of the town for his official approval and delivery to the Town Clerk a proposed undertaking which was apparently sufficient and in due form, except that the sureties had not executed the affidavits of justification, although the name of the notary public appeared under each of said justifications. Upon receipt of this proposed undertaking the Supervisor verbally informed the petitioner that he was doubtful regarding the right of the petitioner to file the undertaking, but the Supervisor retained the same until March 14, 1913, when he returned it by mail to the petitioner with a letter stating it had not been approved because it had not been executed and delivered within the time provided by law, and also because it had not been properly executed. Later the petitioner again presented to the Supervisor the undertaking without the defect mentioned being cured, and upon being informed by the Supervisor that he would not approve it, the petitioner threw it upon the counter near by and told the Supervisor to do what he pleased with it.

On or about March 15, 1913, the Town Board of the Town of McDonough held a meeting at which a resolution was adopted reciting that a vacancy existed in the office of the Town Superintendent of Highways of the town by reason of the fact that the petitioner who had received the greatest number of votes for said office at the last biennial town meeting had failed to qualify for

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the office, as required by law, and appointed William P. Keator of said town to fill the vacancy. Said Keator qualified and has since been acting as Town Superintendent of Highways.

It does not appear that prior to this time the petitioner knew that the two protested ballots had been finally determined by the Board to have been valid, and there is no evidence in this proceeding indicating where and when the election officials arrived at the conclusion that the ballots were valid, although their validity is impliedly stated in the Town Board's resolution of March 15, 1913.

About November 1, 1913, the petitioner demanded of the respondent, Keator, the books and documents belonging to the office, but was unable to obtain them. Prior to said election William P. Keator had been Town Superintendent of Highways for a number of years. The petitioner has not presented any other undertaking to the Supervisor for approval and filing. No further steps have been taken by the petitioner to obtain the office until on or about February 20, 1914, when this proceeding was commenced.

After this application had been made to the Attorney-General, and upon March 24, 1914, the Town Board of McDonough held a meeting and adopted a resolution reciting that inasmuch as a vacancy had existed in the office of Town Superintendent of Highways of the town since November 1, 1913, William P. Keator, the respondent, should be and was appointed to fill such vacancy.

The petitioner's attorney has had notice of the adoption of this resolution and has commented upon it in an additional statement made to the Attorney-General. It is not denied that petitioner was duly elected Town Superintendent of Highways of the Town of McDonough at the biennial town meeting on February 11, 1913. It is not denied that his oath of office was filed in the Town Clerk's office on March 1, 1913.

APPEARANCES

Herbert L. Brown, Esq., for the Petitioner; Hon. William H. Sullivan and Hon. H. C. Stratton, as counsel, for the Respondent.

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OPINION.

While section 83 of the Town Law provides that every Town Superintendent of Highways, elected to office, shall, before he enters on the duties of his office and within ten days after he shall have been notified of his election, take and subscribe the constitutional oath of office, there is no evidence in this proceeding that the petitioner was ever notified of his election.

Section 64 of the Town Law, providing that the result of the canvass as read by the clerk of the Election Board to the persons there assembled shall be notice of the election to all persons whose names appear upon the poll list, is not applicable in view of the Election Board regarding two of the ballots cast for the petitioner as protested and void ballots.

Section 111 of the Town Law provides that every Town Superintendent of Highways shall, within ten days after notice of his election, execute an undertaking with two or more sureties, to be approved by the Supervisor of the town, to the effect that he will faithfully discharge his duties as such Superintendent, which undertaking shall be delivered to the Supervisor and filed by him in the office of the Town Clerk within ten days thereafter.

The petitioner filed his undertaking with the Supervisor on March 1, 1914, but the Supervisor held it for some time and then returned it to the petitioner, and it was never filed in the office of the Town Clerk. Upon its return to the petitioner he delivered it again to the Supervisor. There is no question as to the liability of the sureties on an official undertaking where there is a technical defect, such as the omission of sureties to sign the affidavits of justification. (Section 11, Public Officers Law, amended L. 1911, ch. 424; L. 1912, ch. 481; and L. 1913, ch. 325, in effect April 19, 1913; *City of Mt. Vernon v. Brett*, 193 N. Y. 276, 287; *Supervisors of Allegany Co. v. Van Campen*, 3 Wend. 48.)

It has been held that the statutory provisions regarding time within which an elected officer shall file his oath of office and undertaking are directory and that it is sufficient if he qualifies by filing the oath of office and delivering the undertaking at the time his term of office begins and before the office has been declared

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forfeited. (*Matter of Drury*, 39 Misc. 288.) The petitioner's term of office did not begin to run until the 1st day of November, 1913. There was no vacancy in the office before November 1, 1913. It has been held that when an elective officer files his oath of office he has thereby accepted the office. (*Matter of Bradley*, 141 N. Y. 527.) Inasmuch as the petitioner had done this it cannot be said that he has refused to accept. There was then no vacancy which the Town Board could declare. He became Town Superintendent of Highways as the result of the election and accepted by filing his undertaking and oath of office.

It has been held that the provisions of the Town Law relative to the time within which one elected must take the oath of office and file his bond, are directory merely. The resolution adopted by the Town Board last March, declaring a vacancy since November 1, 1913, does not change the rights of the petitioner. One who has been duly elected to office and has accepted cannot be displaced, except by a direct proceeding. (*Cronin v. Stoddard*, 97 N. Y. 271; *Foot v. Stiles*, 37 N. Y. 399; *People v. Crissey*, 91 N. Y. 616; *Horton v. Parsons*, 37 Hun, 42, 45; *Matter of Petition of Kendall*, 85 N. Y. 302.)

RECOMMENDATIONS.

I would, therefore, recommend that the application for leave to commence an action of quo warranto to test the title of William P. Keator to the office of Town Superintendent of the Town of McDonough, Chenango County, be granted upon the usual conditions imposed by the rules and practice of the Attorney-General's office.

Dated, May 19, 1914.

AUGUST MERRILL,
Deputy Attorney-General.

Application granted by Attorney-General on report May 20, 1914.

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MEMBERSHIP CORPORATIONS — GENERAL CORPORATION LAW, SECTION 131, SUBDIVISIONS 1 AND 2.

Petition for involuntary dissolution, or annulment of the charter, of a membership corporation denied upon the ground that the petitioner had failed to present to the Attorney-General any good reason to believe that an action can be maintained in behalf of the People of the State; illegal acts of an agent not authorized or adopted by some corporate act no ground for annulment.

Report to the Attorney-General in the Matter of the Application of WILLIAM A. MALLETT for the involuntary dissolution, or annulment of the charter, of THE HUMANE SOCIETY OF NEW YORK, a domestic membership corporation.

STATEMENT.

This is an application of the Attorney-General for a "forfeiture of the charter of The Humane Society of New York as provided by the Laws of the State of New York," upon the ground that it has offended against some provision of the act under which it was created and that it has violated some provision of law whereby it has become liable to be dissolved by the abuse of its powers.

APPEARANCES.

Willoughby B. Dobbs, Esq., attorney for petitioner, 3197 Third Avenue, New York City.

Hirsch, Scheuerman & Limburg, Esqs. (Herbert R. Limburg, Esq., of counsel), attorneys for the respondent, 160 Broadway, New York City.

REPORT.

FACTS.

The respondent corporation was organized under the Membership Corporations Law as the "Henry Bergh Humane Society" in 1904. Two years later the Legislature, by virtue of chapter 489 of the Laws of 1906, permitted the society to change its name, and enlarged the objects and purposes of the society by adding to those set forth in the articles of incorporation the following "to provide effective means for the prevention of cruelty to animals in the City of New York, State of New York; to enforce all laws which are now or may hereafter be enacted for the protection of

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animals; and to secure by lawful means the arrest, conviction and punishment of all persons violating such laws."

The petitioner is a life member of the respondent corporation.

The original powers expressed in the certificate of incorporation are enumerated in the following list.

1. To hold public meetings, lectures and distribution of written and printed matter prepared for or purchased by the Society.
2. Agitation for instruction in humane ideas in schools.
3. Aiding the formation and continuance of clubs for the practice and dissemination of humane ideas by children.
4. Giving prizes (or rewards) for the performance or assistance in the performance of humane acts.
5. Erecting of drinking fountains with suitable inscriptions.
6. Receiving and executing gifts for the preceding and similar purposes.

From time to time, as occasion presented, the corporation has exercised all of the powers therein enumerated. One of the complaints of the petitioner is that the corporation has not exercised all of these powers all of the time.

The chief business of the respondent, since the Legislature conferred police powers on it, has been the enforcement of the sections of the Penal Law relating to cruelty to animals. The City of New York is divided by the Society into districts. Agents of the Society are assigned to the several districts. They act as patrolmen and arrest drivers of sick, sore and disabled horses and abusers of other animals, arraign them before city magistrates and attend hearings and trials of such complaints. Fines collected are paid to the Society through the comptroller of the City of New York.

The petitioner complains that the respondent is actuated solely by a desire to collect fines and to secure convictions whether the evidence is sufficient or not and undertook to prove that design by showing that the Society's agents tried, by intimidation and wrongful suggestion to procure pleas of guilty from drivers placed under arrest. The agents called as witnesses by the petitioner denied the practice. There is no evidence to substantiate this charge except in one isolated case. There is no evidence whatsoever that such conduct was either authorized or ratified by any

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corporate act. The penalty of corporate death will not be inflicted upon a corporation for the unauthorized and illegal acts of its agents, assuming that such acts were proved which is not the fact in this case.

The petitioner charged that the executive officers of the Society gave instructions, through the Society's superintendent, to the agents not to bring cases before city magistrates who had the reputation of summarily discharging drivers arrested for cruelty or of inflicting nominal fines. He further charged that agents were discharged if they did not procure enough fines to equal or exceed their salaries. None of these matters were proved to my satisfaction, but if they were they are matters affecting the management of the corporation which the petitioner, as a member, might properly bring to the attention of his fellow members for condemnation or to effect a change of management.

CONCLUSION AND RECOMMENDATION.

The petitioner has failed to indicate that the respondent has offended against any provision of the Membership Corporation Law or that it has violated any provision of law whereby it has forfeited its charter or become liable to be dissolved by the abuse of its powers.

There is no reason to believe that an action can be maintained against the corporation in the name of the people.

It is respectfully recommended that the petition be denied.

Dated, New York City, May 20, 1914.

WILLIAM A. McQUAID,

Deputy Attorney-General.

Application denied by Attorney-General on report, May 22, 1914.

OPINIONS OF THE ATTORNEY-GENERAL

THIRD QUARTER

July 1-September 30, 1914

EXHIBIT F

**The NATIONAL RIFLE
ASSOCIATION
OF AMERICA**



BYLAWS

AS AMENDED

APRIL 29, 2019

A NEW YORK STATE MEMBERSHIP
CORPORATION CHARTERED IN 1871

The National Rifle Association of America

The National Rifle Association, chartered in 1871, is not only the oldest sportsmen's organization in America, but also is an educational, recreational and public service organization dedicated to the right of the individual citizen to own and use firearms for recreation and defense.

The NRA is a nonprofit corporation supported by membership dues and contributions from public spirited members and clubs. It is not affiliated with any arms or ammunition manufacturer nor with any business which deals in guns or ammunition. It receives no appropriations from Congress.

The NRA cooperates with all branches of the United States Armed Forces, federal agencies, state and local governments interested in teaching small arms marksmanship and firearm safety to the maximum number of Americans.

During World War II, NRA members taught over one million seven hundred thousand Americans the correct use of small arms in preinduction training courses.

Past presidents of the Association include: U.S. President Ulysses S. Grant and General Philip H. Sheridan. Among the many notables who have been members of the National Rifle Association are: eight Presidents of the United States, two Vice Presidents of the United States, two Chief Justices of the U.S. Supreme Court and numerous U.S. Congressmen, as well as legislators and officials of the several state governments.

(This supersedes the printed copy of the Bylaws as amended September 10, 2016 and April 29, 2017).

NOTE: AMENDMENTS IN BOLD FACE ITALICS SHALL NOT BE REPEALED OR AMENDED BY THE BOARD OF DIRECTORS.

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Bylaws

ARTICLE I

Name

The name of this organization is the National Rifle Association of America.

ARTICLE II

Purposes And Objectives

The purposes and objectives of the National Rifle Association of America are:

1. To protect and defend the Constitution of the United States, especially with reference to the God-given inalienable right of the individual American citizen guaranteed by such Constitution to acquire, possess, collect, exhibit, transport, carry, transfer ownership of, and enjoy the right to use, keep and bear arms, in order that the people may exercise their individual rights of self-preservation and defense of family, person, and property, and to serve in the militia of all law-abiding men and women for the defense of the Republic and the individual liberty of the citizens of our communities, our states and our great nation;

2. To promote public safety, law and order, and the national defense;

3. To train members of law enforcement agencies, the armed forces, the National Guard, the militia, and people of good repute in marksmanship and in the safe handling and efficient use of small arms;

4. To foster, promote and support the shooting sports, including the advancement of amateur and junior competitions in marksmanship at the local, state, regional, national, international, and Olympic levels;

5. To promote hunter safety, and to promote and defend hunting as a shooting sport, for subsistence, and as a viable and necessary method of fostering the propagation, growth and conservation, and wise use of our renewable wildlife resources.

The Association may take all actions necessary and proper in the furtherance of these purposes and objectives.

*Article III, Sec. 1***ARTICLE III****Membership****Section 1. Eligibility.**

(a) Any citizen of the United States who is and while he remains of good repute, who subscribes to the objectives and purposes of the Association, or any organization as hereinafter described, shall be eligible to be a member of the Association, provided that citizens of foreign nations and organizations composed in whole or in major part of citizens of foreign nations may be admitted to membership as provided in Sections 3 and 4 of this Article.

(b) No individual who is a member of, and no organization composed in whole or in part of individuals who are members of, any organization or group having as its purpose or one of its purposes the overthrow by force and violence of the Government of the United States or any of its political subdivisions shall be eligible for membership.

Section 2. Dues and Contributions.

The dues or minimum contributions of each class of membership shall be fixed by the Board of Directors. Except for those persons who are lifetime members elected prior to July 1, 1979, all members of all classes with addresses not within the domestic United States may be required to pay the additional postage costs necessary for Association mailings to their stated addresses. The imposition of such requirement and the amount of such costs shall be determined administratively from time to time.

Section 3. Individual Members.

(a) **Individual Members.** Individual members shall be Benefactor, Patron, Endowment, Life, Annual, and such other members as are designated in this section.

(b) **Honorary Life Member.** A person may be nominated for Honorary Life membership by the Executive Council and be elected to such

Article III, Sec. 3

membership by the Board of Directors in recognition of outstanding service to the Association on a national scale in any one or more of the primary fields of endeavor of the National Rifle Association of America. Not more than three individuals shall be elected as Honorary Life Members in any one calendar year. Honorary Life Members shall enjoy all the rights and privileges of Life Members.

(c) **Lifetime Members.** Benefactor, Patron, Endowment, and Life Members are members for life.

(d) **Associate Member.** A person who elects to pay reduced dues may become an Associate member on an annual basis upon payment of such dues as may be determined by the Board of Directors.

(e) **Junior Member.** A person 20 years of age or under, who pays such dues as may be determined by the Board of Directors, may become a junior member. Such status shall continue through the end of the calendar year in which his or her 20th birthday occurs.

(f) **Non-Citizen Member.** A citizen of a nation other than the United States, whether resident within or without the United States, who is interested in the pursuit of the purposes and objectives of the Association may become a member of the Association in any of the classes listed in this Section, subject to the limitation of Section 6(e) of this Article, upon the fulfillment of any condition for membership within said class. Non-citizen memberships shall be subject to termination or suspension by vote of the Board of Directors, or the Executive Committee, if the Board is not in session, whenever, by proclamation of the President of the United States, or by action of the Congress, the nation of which any such member is a citizen is in a state of war or active military hostilities with the United States, and good cause exists for such termination or suspension.

(g) **Membership Categories.** The Board of Directors may establish Membership Categories for individual members of various Membership Classes. Membership shall be in accordance

Article III, Sec. 4

with administrative requirements and procedures approved by the Executive Vice President. The Board may provide for reduced or augmented dues for members belonging to such categories.

(h) **Upgrading Class of Membership.** An individual member of one class may become a member of a different class, if qualified therefor, by contributing the minimum dues or contribution specified by the Board of Directors for the class of membership desired, less the contribution specified for his current membership.

Section 4. Affiliated or Participating Organizations.**(a) Affiliated Organizations.**

The following affiliated organizations are organization members:

(1) **State Association.** An organization in a single state or territory that promotes and supports the purposes and objectives, policies and programs of the National Rifle Association. Membership shall be composed primarily of individuals, clubs and other organizations of that state or territory. Affiliation as the official State Association shall be by approval of the Board of Directors of the National Rifle Association, and not more than one organization may be so affiliated to represent any state or territory.

(2) **Approved Organization.** An organization other than a local club, composed primarily of individuals and/or clubs from a single state or territory, formed to promote one or more of the purposes and objectives of the National Rifle Association in the state or territory for which it is organized. Affiliation shall be in accordance with administrative requirements and procedures approved by the Executive Vice President.

An organization whose purposes and/or programs conflict with those of an existing affiliate in a state or territory shall not be affiliated.

(3) **Club.** A local organization composed of not less than five citizens of the United States, whose purposes are consistent with those of the National Rifle Association. Affiliation shall be

Article III, Sec. 5

in accordance with administrative requirements and procedures approved by the Executive Vice President.

(b) Non-Citizen Organizations.

An organization of five or more members, wherever located, composed in whole or in major part of citizens of countries other than the United States, the purposes of which are consistent with those of the National Rifle Association. Enrollment shall be in accordance with administrative requirements and procedures approved by the Executive Vice President. Such organization membership shall be subject to termination or suspension in the same manner as provided in Section 3(f) of this article.

(c) Participation By Other Organizations.

A nonprofit organization, including a national, regional, or state membership organization, educational institution, summer camp, or law enforcement organization, the purposes of which are not inconsistent with those of the National Rifle Association, may affiliate with the NRA or participate in programs of the NRA, in accordance with administrative requirements and procedures approved by the Executive Vice President.

A commercial organization or enterprise, including a private security agency, the purposes of which are not inconsistent with those of the National Rifle Association, may participate in specific programs of the NRA, in accordance with administrative requirements and procedures approved by the Executive Vice President.

Section 5. Admission to Membership.

(a) An appropriate card, certificate or insignia shall be issued to each member as evidence of membership.

(b) Any applicant for any class of membership or affiliation may be refused admission or affiliation by the Board of Directors for any reason deemed by it to be sufficient.

*Article III, Sec. 6***Section 6. Rights and Privileges of Members.**

(a) All members who comply with the regulations and meet the conditions specified for any particular match shall have the privilege of competing in such match whether conducted by the Association or its affiliated organizations and of qualifying for such awards as may be established by the Association.

(b) All members shall have the privilege of requesting and receiving from the Association such advice and assistance as may be currently available concerning small arms, ammunition and accessories, range construction, and organization and management of clubs and competitions. A reasonable charge may be made by the Association for such assistance.

(c) Except as provided in this subsection, all individual members of the Association shall be entitled to a subscription to the official journal as a privilege of membership. The Board of Directors may determine reduced dues or contributions for Associate, Junior or undesignated Family members of the Association, on the condition that such members electing to pay reduced dues or contributions shall not be entitled to a subscription to the official journal. Except as provided in Article IV, Section 1(a)(2), no Associate member, Junior member, or undesignated Family member shall be entitled to vote.

(d) All members shall have the privilege to attend and be heard at all official meetings of members, and shall have the right to attend all meetings of the Board of Directors, Executive Committee, and standing and special committees of the Association, except during executive sessions thereof.

(e)(1) Fully paid lifetime members and annual members with five or more consecutive years of membership, as shown in the Association's membership records, who have attained the age of 18 years on or before the fiftieth (50th) day prior to the date of the annual meeting of members and who are citizens of the United States of America shall be entitled to vote. Each such member shall be entitled to cast a vote for not more than one person for each vacancy on the Board of Directors to be filled by the membership at any election of

Article III, Sec. 8

Directors, which vote shall be cast as provided in these Bylaws. In order for such a member to cast a vote at any meeting of members, a properly completed, fully paid application for lifetime membership must have been received by the Secretary on or before the fiftieth (50th) day prior to the date of the meeting, or an annual member must have five years of consecutive membership, as shown in the Association's membership records, and such consecutive membership must be in effect on the fiftieth (50th) day prior to the meeting.

(2) Individual members who are not lifetime members or annual members with five (5) or more consecutive years of membership and who are otherwise qualified to vote pursuant to Section 6(e)(1) above, shall have the right to vote for the seventy sixth (76th) Director on the occasion of the Annual Meeting of Members.

(f) Any member shall have the right to circulate and submit petitions for nominating Directors, to be signed by members entitled to vote, as provided in Article VIII, Section 3.

(g) Members of the Association entitled to vote, and any affiliated organization as defined in Section 4(a) of this Article, shall have the right to petition for removal of any officer, Director, or member of the Executive Council by the procedure provided in Article IX.

(h) Members of the Association entitled to vote shall have the right to demand a special meeting of the members by the procedure provided in Section 8(b) of this Article.

Section 7. Members Holding Office.

The holding of any office or membership on any committee shall be contingent upon membership in good standing in this Association.

Section 8. Meetings of Members.

(a) Annual Meeting of Members. The Association shall hold an Annual Meeting of Members to receive the report of the election of Directors and to transact such other business as may properly come before the meeting, at such time

Article III, Sec. 9

and place as shall be determined by the Board of Directors, but in no case later than November 30th of each calendar year. Notice of the time and place of such meeting shall be published in consecutive issues of the official journal of the Association not less than twice prior to the holding of the meeting.

(b) **Special Meetings of Members.** A special meeting of members of the Association may be called at any time by the President, by the Board of Directors, or by the Executive Committee, or upon demand, in writing, signed by not less than 5% of the members entitled to vote, and stating the specific purpose of the proposed meeting. Notice of the time, place and object of the special meeting shall be published in consecutive issues of the official journal of the Association not less than twice prior to the holding of the meeting. The time and place of such meeting shall be fixed by the President.

(c) **Quorum.** At any annual or special meeting 100 members entitled to vote shall constitute a quorum.

(d) **Presentation of Awards.** No award shall be presented during any meeting of members without the prior approval of the Board of Directors.

Section 9. Duties of Members.

(a) It is the duty of each member to assist in every feasible manner in promoting the objectives of the Association as set forth in Article II of these Bylaws and to act at all times and in every matter in a manner befitting a sportsman and a good citizen.

(b) It is the duty of the officers of organization members to conduct the affairs of their organization in an efficient manner, in accordance with their organization bylaws, and such programs and regulations as may, from time to time, be adopted by this Association. Officers of organization members shall maintain proper records and shall promptly render such reports concerning membership, finances, facilities and activities as may be requested from time to time by the Association. In addition, officers of affiliated organization members shall conduct the affairs of the organization in a fiscally responsible manner, including the development of

Article III, Sec. 11

an annual budget and the completion of an annual audit.

(c) It is the duty of organization members to maintain their shooting ranges in a state of adequate repair, to operate their ranges in a safe manner under properly qualified supervision and to conduct a continuing program of small arms instruction and competition in compliance with the regulations and program of the Association as currently in effect.

Section 10. Voluntary Termination of Membership.

(a) Any individual member may terminate his or her membership at any time by a resignation in writing sent by first class United States mail to the Secretary of the Association, but such member will not be entitled to any refund of dues or contributions already paid.

(b) Any organization member may terminate its membership at any time by a vote of a majority of the members of such organization at any regular meeting or special meeting called for the purpose, by a resignation in writing accompanied by a copy of the minutes of said meeting sent by first class United States mail by the Secretary of the organization to the Secretary of the Association, but such organization member should not be entitled to any refund of dues already paid.

Section 11. Involuntary Termination of Membership and Disciplinary Proceedings.

(a) **Default.** Any member in default in payment of dues shall be terminated from membership and from all privileges of membership.

(b) **Discipline, Suspension and Expulsion.** Any individual or organization member may be disciplined, suspended, or expelled for good cause, including but not limited to, any conduct as a member that is contrary to or in violation of the Bylaws of the Association; for having obtained membership in the Association by any false or misleading statement; or, without limitation, conduct disruptive of the orderly operation of the

Article III, Sec. 11

Association in pursuit of its goals; violating one's obligation of loyalty to the Association and its objectives; or willfully making false statements or misrepresentations about the Association or its representatives. No member so suspended or expelled will be entitled to any refund of dues or contributions already paid.

(c) **Notice and Service by Mail.** Where notice is required under this Section, notification shall be by personal service or by a simultaneous first class mailing and certified mailing to the address of record with the Secretary. Notification by mail shall be deemed to have been served five days after mailing.

(d) **Procedure for Discipline, Suspension, or Expulsion.**

(1) Any member of the Association in good standing may file a complaint with the Secretary of the Association against any individual or organization member. Complaints regarding a member's performance or activity at a competition or competitions shall be filed with the Protest Committee and shall be subject to this procedure only if forwarded to the Secretary for such processing by the Protest Committee.

(2) The complaint must be in writing, notarized, and signed by the complainant. It must distinctly describe the cause for which the member's discipline, suspension, or expulsion is sought. No complaint shall be filed or considered with respect to the same facts or transactions as an earlier filed complaint. Except for a complaint based upon a conviction for an offense which prohibits the person from possessing or receiving firearms under federal law, or on facts which could not have been discovered earlier with due diligence, the complaint shall be based solely on facts, events, and transactions that shall have occurred not more than three years prior to the filing of the complaint. All exhibits referred to in the complaint shall accompany the complaint.

(3) The Secretary shall transmit the complaint to the Ethics Committee for consideration at its next meeting.

Article III, Sec. 11

(4) The Ethics Committee shall determine whether the charges if proved would warrant suspension, expulsion, or other discipline, or should be dismissed.

(5) If the Ethics Committee determines not to dismiss the charges, it shall propose a resolution providing for suspension, expulsion, or other discipline as the appropriate remedy in the event the charges are proved or a hearing is not requested.

(6) The Secretary shall promptly notify the accused member of the proposed suspension, expulsion, or other discipline by mailing him a copy of the resolution. The Secretary shall enclose a copy of the complaint, the exhibits if any, and the Bylaws of the Association. The Secretary shall inform the accused member of the right to a hearing as hereinafter provided and further inform the member that unless the member requests a hearing in writing received by the Secretary within forty-five days after the date of such notice, the proposed resolution will be submitted to the Board of Directors for adoption.

(7) If a hearing is timely requested, the Secretary shall immediately notify the Chairman of the Committee on Hearings. A Hearing Board composed of three hearing officers shall be elected by and from the membership of the Committee on Hearings, none of whom shall have any personal interest in the proceeding. No more than two such hearing officers may be members of the Board of Directors or the Executive Council. The hearing officers shall choose a chairman from among their membership. The Hearing Board shall hold a hearing upon at least sixty days notice to the complainant and the accused.

(8) At the hearing, the complainant, the Association and the accused member may be represented by counsel. The Chairman of the Hearing Board shall preside at the hearing and may rule on all procedural matters. Testimony shall be taken under oath.

(9) At the conclusion of the hearing, the Hearing Board shall determine its recommendation to the Board of Directors.

Article III, Sec. 12

(10) Upon receiving the recommendation of the Hearing Board, or the proposed resolution of the Ethics Committee in the event a hearing was not timely requested, the Board of Directors, in Executive Session, shall consider the submission at its next meeting and may dismiss the charges or, by a three-quarters vote, order the expulsion, suspension or other discipline of the accused member.

(e) **Confidentiality.** All proceedings under this Section shall be confidential.

(f) If the accused person allows his or her membership to lapse by failing to pay dues or by resigning pending final disposition of the complaint, then such person shall not be eligible to rejoin the Association without permission of the Board of Directors.

Section 12. Committee on Hearings.

The Committee on Hearings shall be appointed by the President and composed of nine members entitled to vote, no more than six of whom shall be members of the Board of Directors or Executive Council.

ARTICLE IV**Board of Directors****Section 1. Composition.**

(a) The Board of Directors shall consist of seventy-six (76) Directors as follows:

(1) Seventy-five (75) Directors, elected for three (3) year terms as provided in Article VIII from lifetime members of the Association who are entitled to vote and have been lifetime members for a minimum of 5 years at the time of nomination. This tenure requirement shall not affect any director serving as of April 29, 2019. The Executive Committee may, by a vote of the majority of the members present at a meeting called by the President, either by telephone or in person, waive this tenure requirement and allow a lifetime member who has been such for fewer than

Article IV, Sec. 2

5 years to be put on the ballot for election to the Board of Directors. A request for such a waiver must be submitted to the Secretary and received not more than 45 days after the adjournment of the most recent Annual Meeting of Members. Each such Director (except such Directors elected to fill unexpired terms) shall hold office from the adjournment of the Annual Meeting of Members at which his or her election is announced until the adjournment of the third Annual Meeting of Members next following such election or until his or her successor is elected and qualified. The terms of office of such Directors shall continue to be so arranged that one-third (1/3) of such terms shall expire at each Annual Meeting of Members or until their successors are elected and qualified.

(2) One (1) Director, elected as provided in Article VIII, Section 4, shall hold office from the adjournment of the Annual Meeting of Members at which he was elected until the adjournment of the next Annual Meeting of Members, or until a successor is elected and qualified.

(b) Conviction of a felony shall be a disqualification for nomination to or service on the Board of Directors unless the Board for good cause determines to the contrary.

Section 2. Powers and Duties.

The Board of Directors shall formulate the policies and govern and have general oversight of the affairs and property of the Association, in accordance with applicable law and these Bylaws. The Board shall elect from among its own members a President and one (1) or more Vice Presidents. It shall also elect the Executive Vice President, Secretary and Treasurer of the Association, members of the Executive Committee, and may elect members to the Executive Council. ***All vacancies in the Board occurring between regular elections for any reason shall be filled by persons who ran and lost on the most recent mail ballot in rank order of number of votes received; and each such person shall serve until the adjournment of the next Annual Meeting of Members.***

Article IV, Sec. 3

Any Director, officer, or employee of the Association who is also a member of the governing body of any business, corporate, or other entity (whether as trustee, director, sole-owner, officer, partner, or the like) which receives from the Association any payment(s) for goods or services which total in excess of \$2,000 either within a year or pursuant to any contract or contracts originating within a year shall immediately file a written statement of all such business as to the nature and amount thereof, to the best of his or her knowledge, with the Secretary who shall transmit such statement to the Board of Directors at its next meeting and who shall include all such statements in the Secretary's report at the next Annual Meeting of Members.

Section 3. Meetings.

(a) Regular Meetings. There shall be three regular meetings of the Board of Directors in each year. A first regular meeting of the Board of Directors shall be held within one week after the Annual Meeting of Members and after the election and installation of newly elected members of the Board of Directors as announced at the Annual Meeting of Members. At this meeting of the Board of Directors, the officers for ensuing terms shall be elected and such other business transacted as may properly come before the meeting. The second regular meeting of the Board of Directors shall be held approximately 120 days after the Annual Meeting of Members. The third regular meeting of the Board of Directors shall be held approximately 240 days after the Annual Meeting of Members. The exact time and place of each meeting may be determined by the Board of Directors at the previous meeting, reasonable notice being given.

(b) Special Meetings. A special meeting of the Board of Directors may be held at any time on the call of The President, or by action of the Executive

Article V, Sec. 1

Committee, or upon demand in writing stating the object of the proposed meeting and signed by not less than a majority of the Board. Notice of the time, place and object of such special meetings shall be mailed to each Director at least 30 days before the date of holding such meetings.

(c) **Quorum.** At any regular or special meeting of the Board of Directors 25 members shall constitute a quorum.

(d) Upon a request of 20% of the membership of the Board of Directors present, a roll call vote shall be taken on any specified question. ***Every such roll call vote, together with the specified question, shall be published by the Secretary in the official journal within 90 days.***

(e) Upon request of 20% of the membership of the Board of Directors present, the names of the persons voting in the affirmative, in the negative and the abstaining, shall be recorded in the minutes of the meeting but not published in the Official Journal.

Section 4. Indemnification and Advancement of Expenses of Directors of the Association.

The indemnification and advancement of expenses of Directors granted pursuant to, or provided by, the corporate laws of the state under which the Association is incorporated shall not be exclusive of any other rights to which a Director seeking indemnification or advancement of expenses may be entitled, and each Director shall be entitled to such indemnification and expenses immediately to the fullest extent requested in writing to the Secretary or Executive Vice President by such Director unless and only unless prohibited by corporate laws of the state under which the Association is incorporated.

*Article V, Sec. 2***ARTICLE V****Officers****Section 1. Number and Election.**

(a) The officers of the Association shall be a President, one or more Vice Presidents, an Executive Vice President, a Secretary, a Treasurer, an Executive Director of the National Rifle Association General Operations, and an Executive Director of the National Rifle Association Institute for Legislative Action. The President and Vice Presidents shall be elected annually by and from the Board of Directors. The Executive Vice President, Secretary and Treasurer shall be elected annually by the Board of Directors, and they shall serve until their successors have been elected and qualified. ***The Executive Vice President shall be elected by the Board of Directors. In the event that the Office of the Executive Vice President becomes vacant, the succeeding Executive Vice President shall be elected by the Board of Directors at its next meeting.*** The President may not succeed himself or herself more than once, after being elected to serve a full term, except that Charlton Heston may succeed himself as President a second time for the term commencing in the year 2000 and ending in the year 2001, and a third time for the term commencing in the year 2001 and ending in the year 2002, and a fourth time for the term commencing in the year 2002 and ending in the year 2003. When two (2) or more candidates are nominated for office, voting for officers shall be by written ballot.

(b) The Board may not abolish said offices nor create any other offices.

Section 2. Duties of Officers.**(a) President.**

(1) The President shall preside at all meetings of the Association, of the Board of Directors and of the Executive Committee.

(2) With the exceptions of the Nominating Committee, the Committee on Hearings and the

Article V, Sec. 2

Committee on Elections, the President shall be an ex officio member, with vote, of all committees.

(3) Except as otherwise provided in these Bylaws, the President shall appoint all standing and special committees of the Association.

(4) The President shall perform all such other duties as usually pertain to the office.

(b) **Vice Presidents.** The Vice President shall perform the duties of the President in the absence or at the request of the President. In case a vacancy shall occur in the office of the President, the first Vice President shall become President and shall serve for the balance of the term. In case more than one Vice President is elected by the Board of Directors, each Vice President shall be designated in succession by number, and in case of a vacancy shall succeed to the next higher office. With the exceptions of the Nominating Committee, the Committee on Hearings and Committee on Elections, the Vice Presidents shall be ex officio members, with vote, of all committees. The Vice Presidents shall perform such duties as may be delegated by the President or assigned by either the President or the Board of Directors.

(c) **Executive Vice President.** The Executive Vice President shall direct all the affairs of the Association in accordance with the programs and policies established by the Board of Directors. Among his authorities, the Executive Vice President shall be empowered to (1) appoint, suspend with or without pay, or remove the Executive Director of the National Rifle Association General Operations or the Executive Director of the National Rifle Association Institute for Legislative Action; (2) suspend with pay the Secretary or the Treasurer until the next meeting of the Executive Committee or the Board of Directors, whichever occurs first; and (3) employ, suspend with or without pay, or dismiss any employee.

(d) **Secretary.** The Secretary, under the direction of the Executive Vice President, shall have the following duties: (1) have charge of the archives of the Association; (2) attend to the proper publication of official notices and reports,

Article V, Sec. 2

attest documents, and perform such other duties as usually pertain to the office; (3) have such other duties as may be assigned from time to time by the Board of Directors, the Executive Committee, and/or the Executive Vice President; and, (4) shall be Secretary of the Board of Directors, the Executive Committee, the Nominating Committee and the Committee on Elections.

(e) **Treasurer.** The Treasurer shall operate in accordance with the financial policies set forth by the Board of Directors or the Executive Committee, and shall have charge of the books of account and financial operations of the Association. The Treasurer shall regularly report his or her recommendations regarding the financial affairs of the Association to the Finance Committee, Executive Vice President, the Board of Directors, and the Executive Committee. The Treasurer shall assist a firm of certified public accountants selected by the Board of Directors to make an annual audit of the Association's books of account and prepare a statement of financial conditions as of the close of each fiscal year as may be established by the Board of Directors, and shall furnish a copy of such statement, together with the certificate of audit, to each member of the Board of Directors. The funds of the Association shall be placed in such bank or banks as may be designated by the Board of Directors. The Treasurer shall have such other duties as may be assigned to him or her from time to time by the Board of Directors, the Executive Committee, and/or the Executive Vice President.

(f) **Executive Director of the National Rifle Association General Operations.** The Executive Director of the National Rifle Association General Operations shall have such powers and duties as delegated to him from time to time by the Executive Vice President. In case of a vacancy in the office of the Executive Vice President, the Executive Director of the National Rifle Association General Operations shall automatically become the Executive Vice President and serve as such until the next ***meeting of the Board of Directors.***

(g) **Executive Director of the National Rifle Association Institute for Legislative Action.**

*Article V, Sec. 3****The Executive Director of the National Rifle Association Institute for Legislative Action shall, under the direction of the Executive Vice President, conduct the legislative, legal, informational, fund raising activities, operational, administrative and financial***

affairs of the Institute in accordance with the programs and policies established by the Board of Directors. The Executive Director of the Institute shall appoint a Fiscal Officer who shall have charge of the books of account of the Institute, and said Fiscal Officer shall assist the firm of Certified Public Accountants selected to make an annual audit of the books of account of the Institute, and in the preparation of a statement of financial condition of the Institute to be included as a part of the audit and incorporated in the statement of condition of the National Rifle Association of America referred to in subsection 2(e) of this Article. The funds donated to the Association for the use of the Institute or allocated and transferred by direction of the Board of Directors from the Association's other funds, or which are otherwise received by the Institute, shall be placed in such bank or banks, as may be designated by the Board of Directors in accounts designated as "The National Rifle Association-Institute Account," and may be withdrawn only on checks signed by the Fiscal Officer of the Institute and such other signatures as the Board of Directors may prescribe; provided, however, that the Board of Directors may authorize the establishment of special accounts for specific operations or for the payment of routine bills not requiring the Fiscal Officer's signature. Once each fiscal year the Treasurer of the Association shall conduct an internal audit of the books of the Institute and of its general financial condition. The Executive Director, Fiscal Officer and the staff of the Institute shall assist the Treasurer in such internal audit.

(h) The Executive Vice President, the Secretary, the Treasurer, the Executive Director of the National Rifle Association General Operations and the Executive Director of the National Rifle Association Institute for Legislative Action shall be ex officio members, with voice but without vote, of the Board of Directors, the Executive Committee and all committees, special and standing, of the

Article V, Sec. 3

Association, except the Nominating Committee, Committee on Hearings, Officers Compensation Committee and Committee on Elections, and shall be authorized but not required to attend the meetings; provided, however, that the aforesaid officers shall not attend or participate in executive sessions except by invitation of the respective committee or Board.

Section 3. Suspension and Removal.

(a) **Elected Non-salaried Officers.** Any elected non-salaried officer of the Association may be suspended with or without cause by the Executive Committee by a three-fourths (3/4) affirmative vote of the members of the Executive Committee present at any regular or special meeting, such suspension to be effective until the next meeting, either regular or special, of the Board of Directors. Any such officer may be removed with or without cause by the Board of Directors, by a three-fourths (3/4) affirmative vote of the members of the Board of Directors present at any regular or special meeting of the Board of Directors. No vote on suspension or removal may be taken unless at least fifteen (15) days notice in writing shall have been given to the officer of the proposed suspension or removal and of any charges preferred (if the proposed suspension or removal is for cause) and of the time and place of the meeting of the Executive Committee or of the Board of Directors, at which such charges will be considered. Notice of the time, place and object of such meeting, with a full copy of any charges preferred shall be mailed to each member of the Executive Committee or of the Board of Directors at least fifteen (15) days in advance of the meeting. At such meeting the officer whose suspension or removal is proposed shall be accorded a full hearing and may be represented by counsel.

(b) **Elected Salaried Officers.** Any Officer elected by the Board of Directors who is a salaried employee may be suspended with or without cause and with or without pay at any time by the Executive Committee by a three-fourths (3/4) affirmative vote of the members of the Executive Committee present at any regular or special meeting. Such suspension shall be effective until the next meeting,

Article V, Sec. 5

either regular or special, of the Board of Directors. Any such Officer may be removed with or without cause at any time by the Board of Directors, by a three-fourths (3/4) affirmative vote of the members of the Board of Directors present at any regular or special meeting of the Board of Directors. No vote on removal may be taken unless at least fifteen (15) days notice in writing shall have been given to the officer of the proposed removal and of any charges preferred (if the proposed removal is for cause) and of the time and place of the meeting of the Board of Directors at which such charges shall be considered. Notice of the time, place and object of such meeting with a full copy of any charges preferred shall be mailed to each member of the Board of Directors at least fifteen (15) days in advance of the meeting. At such meeting, the officer whose removal is proposed shall be accorded a full hearing and may be represented by counsel.

Section 4. Vacancies.

Except as otherwise provided in Section 2(c) and (f) hereof, in the event of the death, resignation, suspension, removal or permanent disability of any officer, the vacancy thereby caused may be filled by the Executive Committee until the next meeting of the Board of Directors. Except as otherwise provided in Section 2(b) and (c), hereof, the Board of Directors shall elect a replacement to serve out the balance of the term of any such officer.

Section 5. Compensation.

(a) No Director or member of the Executive Council shall receive any salary or other private benefit unless specifically authorized by resolution of the Board of Directors or an authorized committee thereof, but all such persons shall be entitled to reimbursement for expenses incurred on behalf of the Association, to such extent as may be authorized or approved by the Board of Directors.

(b) There shall be an Officers Compensation Committee, which shall consist of the President, who shall serve as the Chairman, the First Vice President and the Second Vice President. In case there shall be no Second Vice President, the

Article V, Sec. 6

President shall appoint a Director to serve in his place.

(c) At the fall meeting of the Directors, the Officers Compensation Committee shall recommend to the Board, and the Board shall, at the same meeting, establish by resolution the authorized compensation for the next budget year for all elected salaried officers, who shall be the Executive Vice President, the Secretary, and the Treasurer. Nothing contained herein shall preclude other meetings of the Officers Compensation Committee as may be called by the President, which may include consideration of the salaries of newly elected salaried officers or of prospective candidates to fill vacancies among the elected salaried officers pursuant to the provisions of Article V, Section 4 of these Bylaws.

All deliberations by the Board of Directors concerning such compensation shall be held in an executive session, at which none of the officers whose compensation is to be or is being established may attend, except for the limited time and limited purpose of answering questions asked by any member of the Board of Directors at the meeting.

(d) The compensation of the Executive Director of the National Rifle Association General Operations and the Executive Director of the National Rifle Association Institute for Legislative Action shall be established by the Executive Vice President.

Section 6. Bonds.

All officers and employees handling moneys of the Association shall be bonded in such amount as may be determined by the Board of Directors. The expense of furnishing such bonds shall be paid by the Association.

ARTICLE VI**Executive Committee****Section 1. Composition.**

(a) There shall be an Executive Committee consisting of the President, any Vice Presidents and 20 members elected from the Board of Directors, as

Article VI, Sec. 4

herein provided.

(b) The 20 members of the Executive Committee nominated by the Nominating Committee or from the floor at any meeting of the Board of Directors, and elected annually by and from said Board, shall serve until their successors are elected and qualified.

Section 2. Powers and Duties.

The Executive Committee shall exercise all the powers of the Board of Directors when said Board is not in session, other than the power to:

(a) Repeal or amend the Bylaws, or adopt new Bylaws;

(b) Fill vacancies on the Board of Directors or the Executive Committee;

(c) Fix the compensation of Directors or Officers;

(d) Remove a Director, with or without cause;

(e) Amend or repeal any resolution of the Board, which by its terms shall not be amendable or repealable;

(f) Adopt and disseminate a fundamental change of view, or basic policy, or basic organizational structure of the Association;

(g) Approve the submission of matters to the members, or submit to the members any action requiring member approval under the applicable statute;

(h) Purchase, sell, mortgage, or lease real property of the Association, or adopt a corporate resolution recommending the sale, lease, exchange or other disposition of all or substantially all the assets of the Association, or authorize major new construction;

(i) Present a petition for judicial dissolution, or to adopt plans of merger, consolidation, or nonjudicial dissolution;

(j) Authorize indemnification of Officers, Directors, members of the Executive Council, or employees; or

(k) Formulate such other corporate policy decisions or perform corporate activities of the

Article VII, Sec. 1

Association of such major significance as to warrant action by the full Board of Directors.

Section 3. Vacancies in the Executive Committee.

A vacancy in the Executive Committee may be filled by a majority vote of the entire Board of Directors.

Section 4. Meetings of the Executive Committee.

(a) Meetings of the Executive Committee will be held on the call of the President, reasonable notice being given.

(b) A special meeting shall be called by the President within twenty-one (21) days of receipt by the Secretary of a demand in writing stating the specific object of the proposed meeting and signed by no less than a majority of the committee.

(c) Notice of the time and place of any Executive Committee meeting, and the stated specific object of any special meeting, shall be sent to each member of the committee, the Board of Directors, and the Executive Council. Other than for a conference telephone meeting pursuant to Article XI, Section 7, such notice shall be sent at least five (5) business days in advance of the meeting. For a conference telephone meeting, such notice shall be sent at least 48 hours in advance of the meeting, except that notice sent less than 48 hours in advance shall be deemed sufficient upon confirmation of delivery to all members of the committee. Members of the Board of Directors who are not members of the committee shall be entitled to attend such meetings at their own expense.

(d) Twelve members of the Executive Committee shall constitute a quorum.

ARTICLE VII**Executive Council****Section 1. Composition.**

(a) There shall be an Executive Council which shall be advisory to the Executive Committee

Article VII, Sec. 3

and the Board of Directors. Any member of this Association whose advice and counsel, in the opinion of the Board of Directors, will be valuable to the continuing welfare of the Association may be elected thereto for life by said Board of Directors.

(b) Any member of the Association may be nominated by any member of the Board of Directors or Executive Council and be elected to the Executive Council for life subject to removal as provided in Section 3 by said Board of Directors.

Section 2. Rights and Privileges.

(a) The members of the Executive Council shall have the right to sit with the Executive Committee and Board of Directors at all regular and special meetings, including any executive sessions thereof. The Executive Council members shall have all rights and privileges of members of the Executive Committee or full Board of Directors, including the right to sponsor Bylaw amendments, to introduce or second motions, debate, serve as a full voting member on, or as chairman or vice chairman of standing or special committees; but Council members who are not members of the Board of Directors shall have no right to vote at meetings of the Executive Committee or the Board of Directors.

(b) The Executive Council shall perform such acts and duties as may be specifically delegated to it by these Bylaws, or by the President, the Executive Committee or the Board of Directors.

(c) Any member may serve simultaneously on the Board of Directors and the Executive Council.

Section 3. Removal.

Any member of the Executive Council may be removed for cause by the Board of Directors at any regular or special meeting of the Board of Directors pursuant to procedures outlined in Article V, Section 3(a).

For the purposes of this Article "cause" is set forth in Article III, Section 11(b) of these Bylaws.

*Article VIII, Sec. 1***ARTICLE VIII****Nomination and Election Procedures (For Election of Director by the Mail Ballot)****Section 1. Nominating Committee.**

(a) At each regular meeting of the Board of Directors next following the Annual Meeting of Members, the Board shall elect, by secret ballot, a Nominating Committee which shall be responsible for nomination of Directors, members of the Executive Committee, and officers who are to be elected at the next annual meeting of members or at a subsequent meeting of the Board of Directors. Any vacancy in the Nominating Committee occurring between regular annual elections may be filled by majority vote of the Board of Directors. The Nominating Committee shall also serve as an appeals board of first resort by members seeking to contest a ruling by the Secretary of the Association as to the validity of a petition for nomination of a candidate to elected office in the Association.

(b) The Nominating Committee shall be composed of nine members entitled to vote, no more than six of whom shall be members of the Board of Directors or Executive Council. Nominations for election to the Nominating Committee shall be made from the floor. Following the close of nominations for membership on the Nominating Committee, each Director present at the meeting shall receive one ballot listing the nominees, on which he is entitled to cast not more than one vote for each of nine nominees, of whom not more than six may be members of the Board of Directors or the Executive Council. All nominees for the Nominating Committee shall be voted on together, with the nine receiving the greatest number of votes being elected; provided, however, that no more than six nominees who are members of the Board of Directors or Executive

Article VIII, Sec. 2

Council shall be elected. In case of a tie for the last vacancy, a run-off vote shall be conducted between the nominees tied. A Director whose term expires at the end of the ensuing year shall not be eligible for election to the Nominating Committee. Notwithstanding any other provision of these Bylaws, no person elected to the Nominating Committee shall be eligible for election as a Director during the tenure of the Nominating Committee to which he was elected; nor shall any officer be a member or ex officio member of the Nominating Committee.

(c) No person shall be eligible for election to the Nominating Committee more often than once every three years.

Section 2. Nomination and Election of Directors.

(a) Directors shall be elected from among the lifetime members of the Association. Annual nominations to fill vacancies on the Board of Directors shall be made by the Nominating Committee and by the members through the petition process described in this Article. Annual elections shall be by mail ballot vote of members entitled to vote. The Committee on Elections shall be responsible for the tabulation of the votes, and shall report the results of the election at the Annual Meeting of Members. The provisions of this Article do not apply to the filling of interim vacancies on the Board of Directors, as provided in Article IV, Section 2.

(b) Not later than 240 days prior to each Annual Meeting of Members, the Secretary shall provide notice in the official journal of the Association of the date and place of such Annual Meeting, of the date and place of the meeting of the Nominating Committee at which nominations for Director will be made, and of the procedure for nomination and election of Directors. The notice shall be accompanied by a blank form requesting the recommendation of suitable nominees to be considered by the Nominating Committee. An individual or organization member may make one

Article VIII, Sec. 2

or more recommendations. The Secretary shall again give notification of the Annual Meeting of Members by publication in the official journal of the Association not less than 30 days prior to the time of such Annual Meeting of Members.

(c) Recommendations for nomination by the Nominating Committee must be received by the Secretary not less than twenty days prior to the published date of the meeting of the Nominating Committee to select nominees for the office of Director. The Secretary shall promptly confirm the eligibility of persons recommended and transmit the recommendations to the Nominating Committee.

(d) Not less than one hundred eighty (180) days prior to the Annual Meeting of Members the Nominating Committee shall meet to select from among the members entitled to hold the office of Director a list of nominees. Not less than sixty (60) days prior to the Annual Meeting of Members, the names of the nominees selected by the Nominating Committee and by the petition process described in Section 3 shall be published in the official journal of the Association, together with a short biographical sketch of each. Biographical sketches shall be limited to biographical facts and shall be submitted to the Secretary of the Association by each candidate and shall be sworn to or affirmed by the candidate as being truthful in every respect. Any willful material misrepresentation contained therein shall invalidate the candidacy provided that (1) such misrepresentation shall first be brought to the attention of the candidate by the Secretary, and (2) the candidate persists in the inclusion of such misrepresentation in the biography by submitting a further sworn statement or affirmation reaffirming the truthfulness thereof. The decision of the Secretary of the Association in matters concerning biographies shall be final.

(e)(1) At least forty-five (45) days prior to the date of the Annual Meeting of Members, the Secretary shall mail a printed ballot to each member entitled to vote as provided in Article III, Section 6(e)(1), directed to his last address on record with the Secretary; provided, however, that to receive said ballot all qualifications described in

Article VIII, Sec. 2

Article III, Section 6(e)(1) must have been met on or before the fiftieth (50th) day prior to the Annual Meeting of Members, and a properly completed, fully paid application for lifetime membership must have been received, or an annual member must have five or more years of consecutive membership, as shown in the Association's membership records, on the fiftieth (50th) day prior to the date of the Annual Meeting at which the election of directors is announced.

(2) The ballot shall list thereon the names, cities and states of principal residence of all nominees proposed by the Nominating Committee, as well as the names, cities and states of principal residence of those nominated by the petition process pursuant to the provisions of Section 3 hereof. The order of the names on the ballot shall be rotated as determined by the Committee on Elections. The ballot shall provide five blank spaces for write-in candidates. A return envelope with means for authentication, including a place for signature and address of the member, shall be enclosed with each ballot. The final date on or before which the ballot must be received by the Association in order for it to be counted shall be shown clearly on the face of the ballot.

(f) A member eligible and desiring to vote shall clearly mark his ballot for his choice of Directors. He may make his selection from the list of candidates printed on said ballot, and/or he may write the name, together with the city and state of principal residency of each other member whom he wishes to be on the Board and believes to be eligible to hold the office of Director. In any event, if his ballot is to be valid, he must not vote for a number of candidates greater than the total number of Directors to be elected by the mail ballot. Having marked his ballot and signed the authentication, the member must place and seal the ballot in the return envelope. Any ballot received by the Association later than the 20th day preceding the date of the Annual Meeting of Members shall be invalid and shall not be opened or counted.

(g) Prior to the Annual Meeting of Members the President each year shall appoint a Committee on

Article VIII, Sec. 2

Elections, no member of which shall himself be a nominee proposed by the Nominating Committee or by the petition process described in Section 3 hereof, to conduct the election of Directors. It shall be the duty of that Committee to determine whether every member elected to the office of Director is eligible to hold the office. The Executive Vice President shall, at the request of the President or the Chairman of the Committee on Elections, make available such employees of the Association as may be necessary to assist the Committee in the examination and validation of the ballots as set forth in subsection (h) of this section.

(h) Upon the receipt of a ballot by the Association on or before the prescribed latest date, the Committee on Elections shall verify the name of the voter against the rolls of members entitled to vote, and verify the eligibility to hold the office of Director of any write-in names on the ballot. A ballot shall be invalid if not cast on the official printed ballot form provided by the Secretary; or if not received by the Association on or before the prescribed latest date specified on the ballot; or if not authenticated by a member entitled to vote; or if more than one ballot is received from the same voter; or if the ballot is not clearly marked; or if the ballot contains more than one vote for a single candidate; or if the ballot contains votes for more than the number who are to be elected Directors. No ballot shall be invalidated for failure to contain a vote for one person for each of the vacancies to be filled at said election.

(i) A ballot judged invalid shall have the reason noted thereon and be initialed by the person who examined it. All ballots, whether judged valid or invalid, and all returned envelopes, including authentication, shall be preserved by the Association for 120 days. Up to that time, any member entitled to vote may make application to the Executive Committee or the Board of Directors, whichever shall meet first, for a canvass or recount upon such terms and conditions as that body may prescribe, and for redress thereafter, if appropriate. If no such application is made before the time herein specified, all protests and grievances concerning

Article VIII, Sec. 3

the election shall be deemed to have been waived, and the ballots and return envelopes including authentications may then be destroyed.

(j) The Committee on Elections shall serve as election tellers and the chairman of the committee shall announce the results of the election when called upon to do so by the presiding officer at the Annual Meeting of Members. The chairman of the Committee on Elections shall include in his report the total number of ballots received, the total number of all ballots judged valid and judged invalid, and the total number of votes received by each person. The chairman shall declare elected to regular three (3) year terms those persons who, in numbers equal to the number of such vacancies, receive the largest number of the votes cast; and shall declare elected to specified incomplete terms, if any, beginning with the longest remaining incomplete term or terms, those persons who receive the next largest number of votes cast. In the event of a tie vote between two or more persons for the last vacancy to be filled in any term at issue, the tie shall be decided by lot by a means to be determined by the Committee on Elections.

(k) The results of the election by mail ballot as announced at the annual meeting shall be published in the Official Journal within 90 days after such announcement.

Section 3. Nomination of Directors by Petition.

(a) In addition to such persons as are selected by the Nominating Committee as provided in Section 2 of this Article, an individual qualified to hold office may be nominated for Director by petition of the members.

(b) Any member ("sponsor") may circulate a petition calling for the nomination of a qualified member for the office of Director. A petition shall be valid only if received by the Secretary not more than 45 days after the announced date of the meeting of the Nominating Committee to select nominees for the office of Director. A petition may consist

Article VIII, Sec. 3

of multiple pages, but all pages must be submitted by the proposed nominee. The Secretary shall prescribe the format of the petition and furnish forms upon request. No petition for nomination of a person for the office of Director shall contain the name of more than one proposed nominee, nor shall a petition be submitted to the Secretary which contains the name of more than one proposed nominee per sheet. No petition for nomination of a person for the office of Director shall be valid without the proposed nominee's written permission filed with the Secretary on or before the last day for submission of petitions. The petition may contain a brief resume approved by the proposed nominee. The name of a sponsor(s) shall be indicated on each sheet of the petition. The petition must bear the original handwritten signatures, names, membership identification numbers, addresses and date of signing of a number of members eligible to vote that is not less than 0.5% of the number of valid ballots cast in the most recent mail ballot election of directors, which number shall be provided by the Secretary to any member upon request. Each petition shall indicate the proposed nominee's principal city and state of residence, and not more than five petition nominees shall be from any one state during any one year. In the event there are petitions for more than five proposed nominees from one state, the five proposed nominees who have the greatest number of signatures on the petition shall be nominated; provided, however, that in case of ties, the Nominating Committee shall select by lot among those having the same number of petition signatures. In no event shall the date of signing be prior to the adjournment of the most recent annual meeting of members.

Article VIII, Sec. 3

(c) The Secretary shall immediately determine the validity of all petitions received and the eligibility of all signatories to vote.

(d) In the event the petition shall have been found invalid, the Secretary shall immediately notify the proposed nominee and the sponsor(s) stating the reasons for such ruling. The proposed nominee or a sponsor may appeal this ruling to the Nominating Committee in writing within fourteen days of such notice. If the petition is ruled valid by the Nominating Committee, the proposed nominee shall be certified as a nominee. If the petition is denied by the Nominating Committee, the proposed nominee or a sponsor may appeal to the Board of Directors who shall act on the appeal at the next Board meeting. If said Board rules the petition valid, the proposed nominee shall be declared a nominee for the next annual election of Directors.

(e) On the official ballot for the election of Directors, no persons nominated by petition nor by the Nominating Committee shall be so designated. Nothing contained in this section shall prohibit publication of the Report of the Nominating Committee in any copy of the Association's official journals; nor prohibit any candidate from designating the method or methods of nomination in his or her biographical sketch; nor prohibit paid advertisements from containing such information.

(f) All applicable rules of Section 2 of this Article shall apply equally to all nominees, whether selected by petition or Nominating Committee.

*Article IX, Sec. 1***Section 4. Election of One Director at Annual Meeting of Members.**

One Director shall be elected for a one-year term on the occasion of each Annual Meeting of Members by a plurality of the votes cast by those individual members present in person (and not by proxy) who are entitled to vote pursuant to Article III, Section 6(e). Such Director shall be chosen only from those persons who were nominated as candidates for election for Director in the mail ballot (Article VIII) immediately preceding said Annual Meeting of Members, but who failed to be elected thereby.

ARTICLE IX**Removal of Association Officials by Recall****Section 1. Petition for Removal by Recall.**

Notwithstanding any other provision of these Bylaws, any voting member of the Association ("sponsor") may in a single petition call for the removal of one officer, or Director, for good cause, in the manner hereinafter provided. For the purposes of this Article, "good cause" is set forth in Article III, Section 11(b) of these Bylaws.

Section 2. Procedure.

(a) Not less than 270 days prior to any Annual Meeting of Members of the Association, any member entitled to vote (the "sponsor") may submit to the Secretary of the Association a petition in writing which calls for or proposes such removal.

(b) In order to be valid:

(1) Such petition for removal shall be in writing, notarized, and signed in handwriting by the sponsor, and must be received by the Secretary no later than the deadline specified in subsection (a) of this section. It shall distinctly describe the cause for which the person's removal from office is sought, and except for a petition based

Article IX, Sec. 2

upon a conviction for an offense which prohibits the person from possessing or receiving firearms under federal law, or in cases of newly discovered evidence which could not have been discovered earlier with due diligence, shall be based solely on facts, events, and transactions that shall have occurred not more than three years prior to the filing of the petition. No petition shall be filed or considered with respect to the same facts or transactions as an earlier filed petition for the removal of the same person, or if it contains willful false statements or misrepresentations, or if it is completely without merit under law (including these Bylaws), or if it is filed to harass or maliciously injure another, to disrupt the orderly operation of the Association in pursuit of its goals, or for any other improper purpose.

(2) The petition shall contain the names, addresses, membership identification numbers, original handwritten signatures and dates of signing of a number of members eligible to vote that is not less than 5% of the number of valid ballots cast in the most recent mail ballot election of directors, which number shall be provided by the Secretary to any member upon request. A petition may consist of multiple pages, but all pages must be submitted by the sponsor.

(3) At least three states of the United States of America shall be represented on the petition by the signatures of no fewer than 100 residents of each such state, as reflected by each signor's last address of record furnished to the Secretary.

(4) Such petition shall contain no signature for which the date of signing is prior to the adjournment of the most recent Annual Meeting of Members.

(5) Such petition shall clearly state that it may be withdrawn by the sponsor without notice to, or approval by, the signatories.

(c)(1) The Secretary shall rule a petition

Article IX, Sec. 2

invalid if it fails to comply with any provision of section (1) of this article or of subsections (a) or (b) of this section.

(2) In the event a petition is ruled invalid by the Secretary, he shall immediately notify the sponsor of the petition and the person whose removal is sought, stating the reasons for such ruling. The sponsor may appeal this ruling to the Committee on Hearings, by a written notice that must be received by the Secretary within 21 days of the Secretary's ruling. The Committee on Hearings shall meet within 10 days to hear such an appeal. The party not prevailing in the appeal to the Committee on Hearings may appeal within 10 days of the ruling by the Committee on Hearings, to the Executive Committee, which shall hold a conference telephone meeting within 10 days to act on the appeal, and the decision of that body shall be final.

(d) In the event that the petition is ruled valid by the Secretary, the person whose removal is sought, and the sponsor of the petition, shall be notified immediately. The person whose removal is sought shall have the right, upon written request received by the Secretary within 10 days of the Secretary's ruling, to inspect the petition, and to appeal the Secretary's ruling, in writing, to the Committee on Hearings within 21 days of such ruling. The Committee on Hearings shall meet within 10 days to hear such an appeal. The party not prevailing in the appeal to the Committee on Hearings may appeal within 10 days of the ruling by the Committee on Hearings, to the Executive Committee, which shall hold a conference telephone meeting within 10 days to act on the appeal, and the decision of that body shall be final.

(e) If, after all appeals, the petition is ruled valid:

(1) a Hearing Board shall be elected as

Article IX, Sec. 2

prescribed in Article III, Section 11(d).

(2) the Hearing Board shall schedule and conduct a hearing as soon as possible at a time and place determined by the Secretary. The hearing shall be conducted in accordance with Article III, Section 11(d)(8). The Hearing Board shall make a complete record of all testimony and exhibits presented, and within 21 days of the date of the hearing shall prepare a written opinion, or a majority opinion and minority view, and a recommendation concerning a disposition of the petition. All proceedings under this subsection shall be confidential.

(f) At the time the Secretary mails out printed ballots to each member of record entitled to vote for the election of Directors, as provided in Article VIII, Section 2(e), he shall also enclose the printed recall ballot containing the name and office for each such person whose removal was the subject of a valid petition, together with a copy of the recommendation of the Hearing Board, including the minority view if the recommendation is not unanimous. Statements not exceeding five hundred words may also be enclosed in the mailing by the sponsor of the petition for recall and by each person whose removal was the subject of a valid petition. The recall ballot shall state as follows:

"Shall (name of office-holder) be removed from membership on the Board of Directors?" (or other specific office in the Association).

(g) In the recall voting procedure, the applicable provisions of Article VIII, Section 2, paragraphs (f), (g), (h), (i), (j), and (k) of these Bylaws shall apply to the use and authentication of prescribed official ballot forms, their validation, the counting of votes, and the announcement of results.

(h) If a majority of votes cast on the recall ballot by members of record entitled to

Article IX, Sec. 3

vote shall call for the removal of an officer or Director, the removal shall be effective immediately upon certification of the results of a mail ballot recall procedure by the Committee on Elections.

(i) In any event, the Secretary shall immediately notify the person whose removal was petitioned and voted upon as to the results of a mail recall ballot, shall simultaneously inform the officers and Directors of the Association of such results and whether a resulting vacancy exists, and shall cause the results of such recall vote to be published in an official publication of the Association as soon as possible.

(j) At any stage of the proceedings under this Article, the sponsor of a petition may, with the written consent of the person against whom the recall petition was directed, withdraw the petition or otherwise terminate the proceedings provided for under this Article by so requesting in writing. At the written request of the person against whom the petition was directed, an announcement of the withdrawal or termination shall be published forthwith in the official journal of the Association.

Section 3. Filling of Vacancies Created by Removal of Office-Holder by Membership.

In the event an officer or Director is removed by recall vote of the membership, the vacancy shall be filled pursuant to the provisions of Article V, Section 4 for officers and Article IV, Section 2 for Directors; provided, however, that no person removed from office by the membership shall be returned to that office by the Board of Directors acting under this provision.

Article X, Sec. 3

ARTICLE X**National Rifle Association Institute for Legislative Action****Section 1. Name and Function.**

The National Rifle Association Institute for Legislative Action shall have sole responsibility to administer the legislative, legal, informational and fund raising activities of the Association relating to the defense or furtherance of the right to keep and bear arms, in accordance with the objectives and policies established by the Board of Directors.

Section 2. Officers.

The Executive Director and Fiscal Officer shall have the duties set forth in Article V, Section 2(g). The Executive Director shall be in general charge of the Institute, shall be responsible for hiring, firing and establishing salary schedules for the remaining staff of the Institute, in accordance with the approved budget and other directives of the Board of Directors.

Section 3. Planning.

At least annually the Executive Director shall prepare and submit to the Board of Directors for approval a detailed plan of action in the following areas:

- (a) Federal legislative activity.
- (b) Legislative action organization development and operation in the political subdivisions of the United States.
- (c) Legal action.
- (d) Legislative information gathering and dissemination.
- (e) Such other legislative activity as may be advisable.
- (f) Fund raising for the above activities.

*Article X, Sec. 4***Section 4. Reports.**

In addition to the planning recommendation under Section 3, the Executive Director shall report to the Board of Directors and the Executive Committee at each meeting thereof as to the activities of the Institute. The report shall indicate specifically all necessary compliance by the Association and its Institute with the applicable Federal, state and local laws regulating legislative activity.

Section 5. Directives.

The Board of Directors shall by resolution from time to time set the legislative, legal action, political education, and informational objectives and policies of the Association relating to the defense or furtherance of the right to keep and bear arms, and shall give specific directions to the Institute in these and such other matters as the Board shall deem advisable.

Section 6. Prohibition of Political Contributions.

Neither the Association, its Institute for Legislative Action, nor any officer, Director, employee, or agent acting on behalf of the Association or its Institute for Legislative Action, shall make any contribution to a political campaign, candidate, or political committee.

ARTICLE XI**Standing and Special Committees of the Association.****Section 1. Standing Committees.**

(a) The standing committees of the Association are as follows:

Action Shooting	Legal Affairs
Air Gun	Legislative Policy
Audit	Membership
Black Powder	Military and Veterans'
Bylaws & Resolutions	Affairs
Clubs & Associations	* Nominating

Article XI, Section 3

Collegiate Programs	**Officers Compensation
Competition Rules & Programs	Outreach
Disabled Shooting Sports	Pistol
Education & Training	Protest
Elections	Public Affairs
Ethics	Publications Policies
Finance	Range Development
Grassroots Development	Shotgun
Gun Collectors	Silhouette
Hearings	Smallbore Rifle
High Power Rifle	Sport Shooting
Hunting & Wildlife Conservation	Women's Policies
Law Enforcement Assistance	Youth Programs

*Members elected by the Board of Directors, pursuant to Article VIII, Section 1.

**Members designated pursuant to Article V, Section 5.

(b) At least once each year, each standing committee shall submit a written report through the Secretary of the Association to the Board of Directors at a regular meeting of the Board, and at such other time as may be requested by the President. It may also make written reports and recommendations to the Board or to the Executive Committee at any regular or special meeting.

Section 2. Special Committees.

The President or the Board of Directors may establish such special committees of the Association as may be deemed necessary from time to time to fulfill the objectives of the Association. Each special committee will report at such time and place as may be specified by the President or the Board of Directors.

Section 3. Committee Members Appointed by President.

Except as otherwise provided in Article V, Section 5, for the designation of members of the Officers Compensation Committee, in Article VI,

Article XI, Section 4

Section 1(b), for the election of members of the Executive Committee, and in Article VIII, Section 1, for the election of members of the Nominating Committee, members of the Board of Directors or of the Executive Council or other members of the Association in good standing may be appointed by the President to membership on such standing and special committees of the Association as may be established, and shall serve at the pleasure of the President or until the adjournment of the next Annual Meeting of Members, or until their successors have been duly appointed, whichever last occurs.

Section 4. Responsibilities of Committees.

The President or the Board of Directors shall assign responsibilities to the committees relating to the administration, conduct, regulation, or oversight of particular activities or special areas or endeavors of the Association, except that no corporate authority may be delegated to any committee unless all members of such committee are members of the Board of Directors of the Association, and unless such committee has been delegated such authority by a resolution adopted by a majority of the entire Board of Directors.

Section 5. Limitations on Powers of Committees.

No special or standing committee of the Board or of the Association shall exercise any powers prohibited to the Executive Committee.

Section 6. Committee Organization; Meetings.

Committee chairmen are authorized to appoint subcommittees and ad hoc committees from among the members of their respective full committee, as the chairman deems necessary. Official meetings of the committees or subcommittees thereof shall be authorized by the President or, in the absence of the President, by a Vice President or the Executive Vice President. Each respective Chairman shall inform the Secretary, who will issue the official notice for such meeting.

Article XIV, Sec. 1

Section 7. Conference Telephone Meetings.

Members of any committee of the Association may participate in a meeting of such committee conducted by means of a conference telephone or similar communications equipment allowing all persons participating in the meeting to hear one another at the same time. Participation by such means shall constitute presence in person at a meeting.

ARTICLE XII

Prohibition of Proxy Voting

At all meetings of the Board of Directors, Executive Committee, other committees of the Association, and meetings of members, each person entitled to vote shall have a right to cast one vote on each question presented, which vote shall be cast in person and not by proxy.

ARTICLE XIII

Corporate Seal

The Association shall have a corporate seal bearing the words "National Rifle Association of America Corporate Seal." The Seal which is impressed on the title page of these Bylaws is the corporate seal of this Association.

ARTICLE XIV

Order of Business

Section 1. Order of Business.

(a) The following shall be the regular order of business at all meetings of the members:

Article XIV, Sec. 1

1. Opening Prayer, Pledge of Allegiance, and National Anthem.
2. Roll call.
3. Adoption of agenda (only if it is proposed to supplement or supersede this order of business).
4. Approve minutes of previous meeting.
5. Reports of officers.
6. Report of Committee on Elections.
7. New Business: Resolutions.

(b) The following shall be the regular order of business at all meetings of the Board of Directors:

1. Opening Prayer and Pledge of Allegiance.
2. Roll call.
3. Adoption of agenda (only if it is proposed to supplement or supersede this order of business).
4. Approve minutes of previous meeting.
5. Introductions, presentations and recognitions.
6. Reports of officers.
7. Reports of standing committees.
8. Reports of funds and special committees.
9. Unfinished business (only if items have come over from the previous meeting because the board adjourned without completing its order of business, regardless of the length of time between meetings).
10. New Business: Resolutions.
11. Good of the Order.
12. Closing prayer.

(c) At any meeting an agenda may be adopted. If it supplements but does not conflict with the order of business provided in these bylaws, its adoption requires a majority vote; if it conflicts with that order of business, its adoption requires a two-thirds vote.

Article XV, Sec. 1

**Section 2. Parliamentary Authority and
Parliamentarian.**

(a) *Parliamentary Authority. Roberts Rules of Order Newly Revised* shall govern the deliberations of all meeting of the members, Board of Directors, Executive Committee, and all other standing committees, special committees, and subcommittees unless specific exceptions are made herein.

(b) *Parliamentarian.* The President may appoint an official Parliamentarian of the Association, who shall serve at the pleasure of the President.

**Section 3. Taking of Votes at Annual Meeting of
Members.**

(a) *The casting of votes at the Annual Meeting of Members shall be by showing of voting credentials, and shall be by paper ballots on a showing of voting credentials of one hundred members entitled to vote requesting such paper balloting or upon request of the chair.*

(b) *Paper ballots at the Annual Meeting of Members shall be collected and immediately placed in custody of a certified public accountant who shall immediately count them and without unnecessary delay shall certify the result of the count to the Chair at the meeting, and the paper ballots shall thereafter be preserved by the accountant for 180 days, and thereafter the accountant shall deliver the ballots to the Secretary for preservation until the adjournment of the next Annual Meeting of Members and until such further times, if any, as decided by vote of the members or, to the extent not inconsistent therewith, by the President.*

Article XV, Sec. 2

ARTICLE XV**Amendments****Section 1. Amendments by the Board of Directors.**

These Bylaws may be amended at any regular meeting of the Board of Directors by a majority vote, provided that the amendment has been submitted in writing at the previous regular meeting of said Board, or has been sent in writing by mail to every member of the Board listed in the most recent Official Directory not less than thirty days prior to the scheduled Board meeting. To qualify under this Section, the proposed amendment must be recommended by the Bylaws & Resolutions Committee as printed in the Bylaws & Resolutions Committee report to the Board of Directors, or signed by at least two members of the Board of Directors or alternatively by two hundred fifty members of the Association entitled to vote.

Section 2. Germane Amendments.

Notice of specific amendments proposed shall not preclude amendments being made from the floor which are germane to the specifically proposed amendments.

Section 3. Amendments by Mail by the Membership.

(a) These Bylaws may be amended by mail in conjunction with the casting of ballots for the election of Directors by a majority vote of those members qualified to vote and voting by mail on the proposed Bylaws amendment. Proposals for changes to be made by mail may be recommended by the Board of Directors or by petition of members.

(b) Proposals for changes in the Bylaws to be made by mail may be submitted by

Article XV, Sec. 3

petition of members and must be received by the Secretary of the Association no later than September 1st of the year prior to the mailing of the ballot in which the proposals to be voted upon will be included. Such petitions must bear the signatures, names, membership identification numbers and addresses of a number of members eligible to vote that is not less than 5% of the number of valid ballots cast in the most recent mail ballot election of directors, which number shall be provided by the Secretary to any member upon request. The petition may be accompanied by one supporting statement of not more than 500 words. Signatures on an amendment proposed by voting members must be handwritten, original signatures, and all signatures must be sent by the same person (the "sponsor"). The petition shall clearly state that it may be withdrawn by the sponsor without notice to, or approval by, the signatories. The Board of Directors may prepare a statement of not more than 500 words in response to a proposal for change submitted by petition, and such statement must be received by the Secretary no later than October 1st.

(c) Proposals for changes in the Bylaws to be made by mail may be recommended by the Board of Directors at any meeting of the Board, provided that the proposed amendment has been recommended by the Bylaws & Resolutions Committee as printed in the Bylaws & Resolutions Committee report to the Board of Directors at the previous regular meeting of said Board, or signed by at least two members of the Board of Directors and either submitted in writing at the previous regular meeting of said Board, or sent in writing by mail to every member of the Board listed in the most recent "Official Directory" not less than forty-five days prior to the scheduled Board meeting. Such proposals may be accompanied by two statements, each

Article XV, Sec. 4

not more than 500 words, one statement representing the majority view and the other representing the minority view of the Board, and must be received by the Secretary no later than October 1st of the year prior to the mailing of the ballot in which the proposals to be voted upon will be included.

(d) A rebuttal statement of not more than 250 words may be prepared by the persons who prepared the corresponding main statement and must be received by the Secretary no later than October 30th.

(e) The proposed changes together with the statements in support and opposition shall be published in the issue of the "Official Journal" of the Association containing the ballot to elect Directors. Ballots for voting on changes in the Bylaws to be made pursuant to this section shall be mailed in accordance with the procedures established under Article VIII, Section 2(e), regarding ballots for election of Directors. The results of balloting conducted pursuant to this section shall be tabulated in accordance with the procedures established under Article VIII Section 2 (h), (i) and (j), to the extent applicable, shall be announced at the Annual Meeting of Members and shall be published in the "Official Journal" within 90 days after such announcement.

Section 4. Authority to Amend or Repeal.

Any Bylaw adopted by the Board may be amended or repealed either by the Board, or by the members by mail pursuant to Section 2 of this Article. Any Bylaw adopted by the members may be amended or repealed by the Board, unless it is adopted in bold face italics, in which case it may be amended or repealed only by the members, by mail, and not by the Board.

*Article XVI, Section 2***ARTICLE XVI****Amendments to the Certificate of Incorporation****Section 1. Recommendation by the Board of Directors.**

(a) Amendments to the Certificate of Incorporation shall be recommended at any regular or special meeting of the Board of Directors by a majority affirmative vote of all Directors currently constituting the Board of Directors, provided that either (i) the amendment has been submitted in writing at the previous meeting of the Board of Directors, or (ii) has been sent in writing by mail to every member of the Board of Directors as listed in the most recent Official Directory not less than forty-five (45) days prior to the scheduled Board of Directors meeting. To qualify for recommendation under this section, the proposal must be signed by not less than ten (10) members of the Board of Directors or Executive Council.

(b) No vote on amendments to the Certificate of Incorporation may be taken unless and until such proposals have been reviewed by outside legal counsel and the Board of Directors has been informed by such outside legal counsel of its opinion as to the legality, propriety, and efficacy of such proposal and its conformity with existing Bylaws and the Not-For-Profit Corporation Law of the state in which the Association is incorporated.

Section 2. Adoption by Members.

(a) Amendments to the Certificate of Incorporation proposed and recommended pursuant to Section 1 above, shall be presented to the members for adoption in conjunction with the casting of ballots for the election of Directors, and shall be approved by a majority affirmative vote of those members qualified to vote and voting by the directed voting procedure described herein at Article XVII. The proposed amendment must be received in writing by the Secretary by the first (1st) day of September of the year immediately preceding the mailing of the ballot in which the

Article XVI, Sec. 3

proposals to be voted on by directed vote will be included. Notice of any such recommended amendments timely received by the Secretary and the exact text of the recommended amendments to the Certificate of Incorporation to be voted upon by the membership by directed voting procedure shall be printed in the NRA Official Journal not less than forty-five (45) days, nor more than ninety (90) days before the mailing of the ballot in which the recommended proposals to be voted on by directed vote will be included.

Section 3. Publication of Notice.

Proposals and recommendations for changes to the Certificate of Incorporation may be accompanied by two statements, each not more than 500 words, one statement representing the majority view of the Board of Directors, and the other representing the minority view of the Board of Directors, and must be received by the Association Secretary no later than October 1st (first) of the year preceding the mailing of the ballots in which the proposals to be voted on by directed vote will be included. The President shall designate persons from the Board of Directors to prepare such statements on behalf of the Board of Directors.

ARTICLE XVII**Directed Voting Procedures of Members**

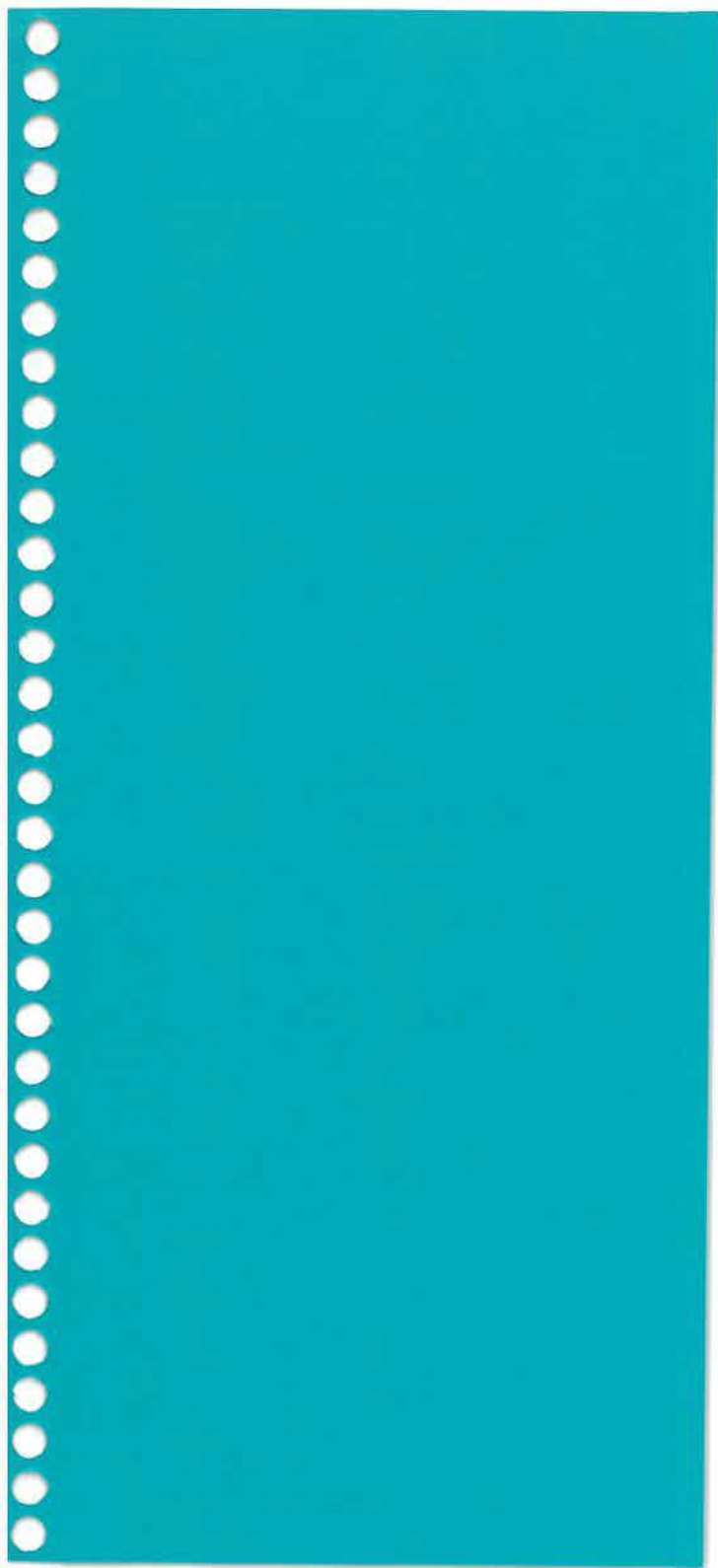
(a) The mail ballot voting procedure described in Article XV, Section 4 of these Bylaws is hereby defined as the Association's "Directed Voting Procedure." Votes of the membership by Directed Voting Procedure shall be termed "directed votes" and shall have the same force and effect as if such vote had been delivered by a member in person at a meeting. A directed vote shall not constitute a vote by proxy and shall not violate Article XII of these Bylaws.

(b) The Directed Voting Procedure shall be used by the membership to elect directors, amend the Bylaws, remove Association officials by recall, and

Article XVI, Sec. 3

amend the Certificate of Incorporation.

(c) Where any provisions of these Bylaws provides for a petition by the members, only original, handwritten signatures on such a petition shall be valid.



11250 Waples Mill Road
Fairfax, Virginia 22030-9400

CL1300051

EXHIBIT G

B R E W E R
ATTORNEYS & COUNSELORS

January 20, 2021

VIA NYSCEF

Honorable Joel M. Cohen
Justice of the Supreme Court of the State of New York
Commercial Division, New York County
60 Centre Street
New York, NY 10007

Re: *People of the State of New York by Letitia James v. National Rifle Association of America, Inc. ("NRA")*, Index No. 451625/2020

Dear Justice Cohen,

Pursuant to the Court's request (NYSCEF No. 196), we write on behalf of Defendant the National Rifle Association of America (the "NRA") to address the impact of the NRA's chapter 11 proceeding, commenced January 15, 2021, on the Court's adjudication of pending motions to dismiss, transfer, or stay these proceedings.

Although the NRA would have supported a brief adjournment in the wake of Mr. Liggio's untimely, unexpected death, the NRA is available to proceed with the hearing and adjudication of its pending motion to transfer venue (NYSCEF No. 133) (which should be decided first as a threshold matter)¹ and motion to dismiss or stay this action (NYSCEF No. 70).

Notwithstanding its agreement to proceed with pending motion practice, the NRA reserves its rights and remedies under the Bankruptcy Code, including its right to apply to the Bankruptcy Court, if appropriate, for any "order, process, or judgement that is necessary or appropriate" to carry out its reorganization. 11 U.S.C. § 105(a). However, the NRA does not intend to make any imminent application that would interfere with the oral argument scheduled for January 21, 2021.

¹ See, e.g., *Romero v City of New York*, 59 Misc. 3d 903, 905 (N.Y. Sup. Ct. 2018) ("once it is decided that venue should be changed, orderly procedure and comity mandate that all motions be relegated to the transferee court") (internal citations and quotation marks omitted).

Hon. Joel M. Cohen

January 20, 2021

Page 2

Sincerely,

/s/ Sarah B. Rogers

Sarah B. Rogers

cc: All Counsel of Record (via NYSCEF)