

B R E W E R
ATTORNEYS & COUNSELORS

December 4, 2021

VIA NYSCEF

Hon. Joel M. Cohen
Supreme Court of the State of New York
60 Centre Street
New York, NY 10007

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

Dear Justice Cohen:

On behalf of Defendant the National Rifle Association of America (the “NRA”), I respectfully file: (i) an amended Reply Memorandum of Law in Support of the NRA’s Motion to Dismiss Amended Complaint (previously filed as NYSCEF 446); and (ii) an amended affirmation in its support (previously filed as NYSCEF 447-454). As the enclosed redlines reflect, this filing

- corrects two factual statements at the top of page 15 of the reply brief,¹ NYSCEF 446 (regarding the number of witnesses who gave sworn testimony [13, not 16] and the number of documents subpoenaed by the NYAG [over 100,000, not over 18,000] during her investigation),
- appends two documents that form the basis for the corrected statements (as Exhibits H and I), and
- corrects several typographical errors.

Counsel for the other parties confirmed that they have no objection to this filing.

Respectfully,

/s/ Svetlana M. Eisenberg

Svetlana M. Eisenberg

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¹ The statements appear on page 14 of the amended reply brief and the redline.