At IAS Part 3 of the Commercial Division of the Supreme Court of the State of New York, County of New York, held at the Courthouse located at 60 Centre Street, New York, New York, on December ______, 2021.

PRESENT: Hon. Joel M. Cohen, J.S.C.

PEOPLE OF THE STATE OF NEW YORK,

Index No.: 653594/2018

Plaintiff,

Hon. Joel M. Cohen

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v.

Motion Sequence No. 021

THE NATIONAL RIFLE ASSOCIATION : OF AMERICA, INC., ET AL.,

[PROPOSED] ORDER PERMITTING FILING UNDER SEAL

Defendants.

WHEREAS, third-party Christopher W. Cox has moved before this Court on December 6, 2021 by Order to Show Cause for an Order to Permit Filing Under Seal (the "Application") in the above-captioned action (the "Action");

WHEREAS, the Application seeks an Order (a) permanently sealing the documents attached as Exhibits 1–4 of the Affirmation of Christopher W. Cox (the "Confidential Documents"); (b) permitting redaction of all text in any document filed publicly in this action quoting or describing the Confidential Document; and (c) directing that the Clerk of this Court and the County Clerk not permit any person other than a party or his counsel to appear herein to copy, examine or peruse the Confidential Document;

WHEREAS, the Court has found that good cause exists pursuant to 22 N.Y.C.R.R. Part 216 of the Uniform Rules of the Trial Courts to issue an Order sealing the Confidential Document;

IT IS HEREBY ORDERED that:

The Confidential Documents shall be maintained by the Clerk of the Court under seal, with access to such documents to be granted only to the Parties and their counsel of record in the Action, and their core personnel and designees in writing upon the presentation of appropriate identification, and that all text in any document filed publicly in this action quoting or describing the Confidential Documents may be redacted.