

P R E S E N T: Hon. Joel M. Cohen, J.S.C.

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	:	Index No.: 451625/2020
PEOPLE OF THE STATE OF NEW	:	
YORK,	:	Hon. Joel M. Cohen
	:	
<i>Plaintiff,</i>	:	Motion Sequence No. 021
	:	
v.	:	SEALING/REDACTION SPREADSHEET
	:	
THE NATIONAL RIFLE ASSOCIATION	:	
OF AMERICA, INC., ET AL.,	:	
	:	
<i>Defendants.</i>	:	
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Exhibit Number	NYSCEF Number	Basis for Sealing/Redacting
1 (Letter Motion)	485, 486	This letter motion quotes provisions of a confidential employment agreement between Christopher Cox and the NRA. Specifically, this motion references provisions of the Agreement related to non-public benefits offered by the NRA as a condition of Mr. Cox's employment. The motion also references the arbitration proceedings, which are confidential under the International Institute for Conflict Prevention & Resolution's rules. See CPR Rule 18, https://www.cpradr.org/resource-center/rules/arbitration/non-administered/2018-cpr-non-administered-arbitration-rules/res/id=Attachments/index=0/2017Non-AdminArbRules%20(web%20version).pdf .
2 (Employment Agreement)	487	This employment agreement contains confidential proprietary business information belonging to the NRA along with extensive information regarding the salary and benefits provided to Mr. Cox during the term of his employment. The document contains an extensive confidentiality provision and the

		NRA has indicated that it considers this agreement to be confidential.
3 (Email)	488,489	This email references confidential provisions of the employment agreement relating to non-salary benefits provided to Mr. Cox as part of his employment with the NRA.
4 (Email)	490,491	This email references confidential provisions of the employment agreement relating to non-salary benefits provided to Mr. Cox as part of his employment with the NRA.

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* *Pro hac vice application forthcoming*

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