

EXHIBIT 4

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**CO-COUNSEL FOR DEBTORS
AND DEBTORS-IN-POSSESSION****UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION****IN RE:****NATIONAL RIFLE ASSOCIATION OF
AMERICA and SEA GIRT LLC,****DEBTORS¹**§
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§**CHAPTER 11****CASE NO. 21-30085-hdh11****JOINTLY ADMINISTERED****DEBTORS' OBJECTIONS AND RESPONSES TO ACKERMAN MCQUEEN, INC.'S
FIRST REQUEST FOR PRODUCTION TO DEBTORS**

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (National Rifle Association of America) and 5681 (Sea Girt LLC).

TO: ACKERMAN MCQUEEN, INC.

C/O G. MICHAEL GRUBER, H. JOSEPH ACOSTA, AND BRIAN E. MASON,
DORSEY & WHITNEY LLP

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the “Federal Rules”), made applicable by Rules 9014, 7026, and 7034 of the Federal Rules of Bankruptcy Procedure, debtors and debtors-in-possession National Rifle Association of America and Sea Girt LLC (the “Debtors”) serve to Ackerman McQueen, Inc. (“AMc” or “You”) Debtors’ objections and responses to Your First Request for Production dated February 28, 2021 (the “Requests” and each, a “Request”), as follows.

I.
GENERAL OBJECTIONS

1. The General Objections set forth below apply to each of the numbered Requests, whether or not specifically stated in the Debtors’ Objection or Response to each Request.

2. Debtors object to the Requests to the extent that they call for the production or disclosure of documents or information that are privileged, or exempt or protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable statutory or common law privilege, prohibition, limitation, immunity, or exemption from discovery (all such material, “Privileged Material”). Debtors production of any documents in response to any Request is not, and shall not be deemed or construed as a waiver of any privilege, right, or objection on the part of the Debtors with respect to any such document or information. In the event that the Debtors produce any Privileged Material in response to any of the Requests, such production is inadvertent and shall not constitute waiver of any applicable privilege, protection, or immunity. Debtors reserve the right to demand from You the return or destruction of any such documents or information.

3. Debtors object to the Requests, including, without limitations, the Instructions, as unduly burdensome to the extent that they purport to require Debtors to prepare a privilege log of work product prepared by or at the direction of counsel, or communications exchanged with counsel, after the commencement of the above-captioned Chapter 11 proceedings (the “Proceedings”).

4. Debtors object to the Requests to the extent that they purpose to impose burdens additional to, or different from, the requirements set forth in the Federal Rules of Civil Procedure and relevant local rules and any rulings of this Court.

5. Debtors object to the Requests as unduly burdensome, cumulative, and duplicative to the extent they purport to seek documents or information already produced to You from any person or source in any other action or proceeding, including Documents produced in the course of multiple ongoing litigations between AMc and the NRA. To the extent that any such materials bear a confidentiality stamp or other such endorsement applied by the NRA prior to its production, the NRA consents to Your use of the document in the Proceedings. The NRA reserves the right to object to any use of such documents by You on the basis of relevance, admissibility, or any other basis.

6. Debtors object to the Requests to the extent that they seek documents that the NRA is prohibited from disclosing under any protective order or any other order from any court or tribunal.

7. Debtors object to the Requests to the extent that they seek documents that contain personal identifying information of the Debtors’ employees, officers, Board members, members, and/or donors. Debtors reserve the right to redact such information to the extent it is not material to the dispute and such redactions are practicable.

8. Debtors object to the Requests to the extent that they seek documents that contain information tending to reveal the identity of NRA donors or members or other information that is protected from disclosure to government entities or other relevant third parties by the First Amendment of the United States Constitution. Debtors reserve the right to redact such information to the extent it is not material to the dispute and such redactions are practicable.

9. Debtors object to the Requests to the extent that that they call for the production of documents containing information that tends to reveal the identity of individuals entitled to whistleblower protections under the law and/or NRA policy and Debtors reserve right to redact documents in order to protect the identity of such individuals.

10. Debtors object to the Requests to the extent that they require production of documents not in the possession, custody, or control of Debtors, or require Debtors to make unreasonable inquiries of other persons or entities.

11. Debtors' responses to the Requests are not intended to be, nor shall any such response be construed to be, a waiver of any objection, right, or remedy that the Debtors may assert now or in the future including, without limitation, objections regarding authenticity, relevance, or admissibility of any of the documents or information provided. For all information and documents provided in response to the Requests, the Debtors reserve all objections regarding the competency, relevance, materiality, authenticity, or admissibility of any such information or document as evidence at the hearing or otherwise.

12. Debtors object to Instructions four and five to the extent that they demand Debtors provide a privilege log with an entry for "each Document, or portion thereof, responsive to a Request for which [Debtors] claim a privilege or other protection" and to the extent that they instruct Debtors to "insert one or more placeholder page(s) in the production," which is

impracticable within this expedited-discovery timeframe. Debtors note that courts in the Northern District of Texas have favored categorical privilege logs in other instances.² Debtors state that they will meet and confer in good faith on a practicable protocol and timeframe for identifying privileges asserted and material withheld.

13. Debtors object to Instruction seven to the extent it directs Debtors to produce “[i]nformation that exists in an electronic form . . . in its native or near-native format” and not convert such information to imaged formats. Debtors will produce images of electronically stored information (“ESI”) when possible, and will produce native files when it is not possible to image the ESI.

14. Debtors object to Instruction ten as unduly burdensome to the extent it purports to require Debtors to “identify the Bates number or range of Documents” already produced to You that are responsive to these Requests.

15. Debtors object to the Definitions, Instructions, and Requests to the extent that they purport to require Debtors to search for or produce documents outside Debtors’ possession, custody, and control, including documents possessed by volunteer outside directors of the NRA who are represented by separate counsel.

16. Debtors reserve the right to supplement or amend these Objections and Responses as necessary as discovery continues.

17. Debtors’ specific objections and responses to the Requests are made subject to, and without waiving, the foregoing General Objections.

² See, e.g., *Manufacturers Collection Co., LLC v. Precision Airmotive, LLC*, 2014 WL 2558888, at *3 (N.D. Tex. June 6, 2014)

II.
SPECIFIC OBJECTIONS AND RESPONSES

REQUEST FOR PRODUCTION NO. 1:

Former and current versions of the NRA Bylaws, including all amendments, effective at any time since January 1, 2010.

RESPONSE:

Debtors object to the timeframe of this request as overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Debtors note, in particular, the low likelihood that any records vintaged 2010 are relevant to AMc's claims in upcoming contested matters. Without waiving any of the foregoing objections or any of the General Objections, Debtors will produce the requested documents effective at any time since January 1, 2016.

REQUEST FOR PRODUCTION NO. 2:

Former and current versions of the NRA Policy Manual, including all amendments, effective at any time since January 1, 2016.

RESPONSE:

Without waiving any of the foregoing General Objections, Debtors will produce the requested documents effective at any time since January 1, 2016.

REQUEST FOR PRODUCTION NO. 3:

Minutes of all meetings associated with NRA governance since January 1, 2016, including but not limited to, meetings of the Board of Directors, Executive Committee, Audit Committee, Finance Committee, and Special Litigation Committee meetings.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors further object to the phrase

“all meetings associated with NRA governance” as vague, overbroad, and indeterminable; for purposes of their response, Debtors will construe this Request to seek minutes or reports of meetings conducted by the committees enumerated within the Request. Debtors object to this request as overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence, particularly to the extent that it seeks records vintaged five years prior to Debtors’ reorganization. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 4:

Documents and communications relating to complaints, concerns, or questions relating to the NRA’s retention and engagement of the Brewer Firm and the amount of money the NRA has paid to the Brewer Firm, including but not limited to all communications with or from the NRA Board of Directors related to the Brewer Firm.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the phrase “complaints, concerns or questions” as overbroad and vague; for purposes of their response, Debtors will construe this Request to seek substantive concerns or questions regarding the scope of Brewer’s retention or Brewer’s fees, contained in communications which are nonprivileged. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Debtors further object to this Request as unduly burdensome, cumulative, and duplicative on the ground that it overlaps with Request No. 16 of the Requests for Production served contemporaneously by the New York State Office of the Attorney General (the “NYAG”);

for purposes of its response, Debtors will provide AMc with copies of the same records produced to the NYAG in response to the NYAG's Request No. 16.

REQUEST FOR PRODUCTION NO. 5:

Communications with any creditor listed on Schedule E/F ("Creditors Who Have Unsecured Claims") [ECF 161] referring or relating to the NRA Bankruptcy, amounts due, payment of outstanding invoices, and/or any terms of such repayment.

RESPONSE:

Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 6:

Documents and communications relating to the Special Litigation Committee referenced in the Resolution Authorizing Chapter 11 Reorganization and Related Retention of Counsel attached to ECF 1 at p. 5 in the NRA Bankruptcy. This Request includes all documents and communications relating to the formation of the committee and all actions taken by the committee since its formation.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors note that the Special Litigation Committee by definition focuses on matters likely to be subject to such privileges. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections,

Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 7:

The engagement letter(s) between the NRA and the Brewer Firm for all matters for which the Brewer Firm has been hired to perform services for the NRA since January 1, 2018.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors will produce responsive records in redacted form.

REQUEST FOR PRODUCTION NO. 8:

Documents reflecting approval by the NRA Board of Directors for all litigation or bankruptcy proceedings initiated since January 1, 2018.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors further object to this Request to the extent it asserts that “approval by the NRA Board of Directors for all litigation” is a valid or cognizable requirement under the NRA bylaws or any governing law; for purposes of their response, Debtors will construe this Request to seek reports and minutes of the NRA Board of Directors that discuss litigation or bankruptcy proceedings during the referenced period. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections,

Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 9:

The Brewer Firm's itemized invoices for all matters for which the Brewer Firm has been hired to perform services for the NRA since January 1, 2018. For avoidance of doubt, AMc understands that any privileged information will be redacted as appropriate.

RESPONSE:

Debtors object to this Request on the ground that it purports to demand (and purports to impose the burden of redacting) facially privileged records pertaining to pre-petition legal work which have no relevance to the issues in these contested matters. Debtors further object to this Request as unduly burdensome, cumulative, and duplicative on the ground that it overlaps with Request No. 16 of the Requests for Production served contemporaneously by the NYAG; for purposes of its response, Debtors will provide AMc with copies of the same records produced to the NYAG in response to the NYAG's Request No. 16.

REQUEST FOR PRODUCTION NO. 10:

Ledger listing or other records of all payments made to Brewer Firm since January 1, 2018, sufficient to reflect corresponding invoice number and invoice date for each payment. This Request includes all payments made to the Brewer Firm for any service, including legal services and public relations services.

RESPONSE:

Debtors object to this Request as overbroad, unduly burdensome, harassing, and irrelevant to the issues in these contested matters. Debtors further object to this Request as cumulative and duplicative on the ground that it overlaps with Request No. 16 of the Requests for Production served contemporaneously by the NYAG; for purposes of its response, Debtors will provide AMc with copies of the same records produced to the NYAG in response to the NYAG's Request No. 16.

REQUEST FOR PRODUCTION NO. 11:

Documents reflecting all contracts or payments by the NRA that have been approved or ratified by the Audit Committee since January 1, 2017.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to this Request as unduly burdensome, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 12:

Produce a copy of all contracts between the NRA and all insiders who received payments, distributions, or withdrawals within one year of the NRA Bankruptcy, as referenced in the NRA's Statement of Financial Affairs, Question 30 [ECF 162], [sic].

RESPONSE:

Debtors object to this Request as overbroad, vague and ambiguous with respect to the terms "insiders" and "payments, distributions, or withdrawals;" for purposes of its response, Debtors will construe "insiders" to mean directors, officers, or relatives residing in the same household therewith, and will construe "payments, distributions, or withdrawals" to exclude payments from sources not encompassed within the bankruptcy estate. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 13:

A copy of the fully executed settlement agreement with Lockton Affinity Series of Lockton, LLC, in the matter styled *National Rifle Association of America v. Lockton Affinity Series of Lockton Affinity, LLC and Kansas City Series of Lockton Companies, LLC*, in the United States District Court for the Eastern District of Virginia, Civil Action No. 1:18-cv-639-LO/JFA.

RESPONSE:

Debtors object to this request as it calls for the production of a document which the NRA is bound, by contract, to keep confidential. Debtors further object to this Request on the ground that it is irrelevant to the issues in these contested matters. Debtors will not produce the document demanded by this Request.

REQUEST FOR PRODUCTION NO. 14:

Documents and communications relating to any monies that the Brewer Firm received, directly or indirectly, related to *National Rifle Association of America v. Lockton Affinity Series of Lockton Affinity, LLC and Kansas City Series of Lockton Companies, LLC*, in the United States District Court for the Eastern District of Virginia, Civil Action No. 1:18-cv-639-LO/JFA, from January 1, 2018 to present.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors further object to this Request to the extent that it purports to require the production, disclosure, or identification of information subject to contractual confidentiality limitations. Debtors object to this Request as vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence with respect to the phrases “[d]ocuments and communications relating to any monies” and “that the Brewer Firm received, directly or indirectly.” Debtors state that this Request appears to reference a pre-petition lawsuit which settled more than two years before the commencement of this proceeding and bears no relation to any of the issues in these contested matters. Debtors will

provide AMc with copies of documents produced in response to the NYAG's Request No. 16.

REQUEST FOR PRODUCTION NO. 15:

Audits, reports, statements, findings, opinions, or other documents prepared by the auditing firms RSM US, LLC, and Aronson, LLC, disclosed in Question 26 of Form 207 ("Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy") [ECF 162], since January 1, 2017, related to the review of the NRA's books and records undertaken by these firms. This Request specifically includes any documents or reports reflecting the NRA's reason for separation from RSM and any reports from Aronson and/or RSM regarding the process of succession between the auditors.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody and control.

REQUEST FOR PRODUCTION NO. 16:

During the 341 Meeting, LaPierre testified regarding an assessment conducted by the law firm Morgan Lewis as to the compliance by NRA management with NRA governance documents, including an analysis of the fees incurred by the NRA to the Brewer Firm. Produce the documents relating to this assessment, including but not limited to any findings, reports, opinion letters or other documents submitted to the NRA by Morgan Lewis.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request as

unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Without waiving any of the foregoing objections or any of the General Objections, Debtors will conduct a reasonably diligent search for responsive information in their possession, custody, or control, and reserve the right to redact documents to protect any privileges.

REQUEST FOR PRODUCTION NO. 17:

Audit letters, reports, statements, findings, opinions, or other documents related to the NRA's audits of its vendors from January 1, 2018, to the present, including but not limited to the documents from the audit of AMc conducted by Forensic Risk Alliance in 2019 reflecting the findings, opinions, and conclusions of that audit.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc, including thousands of pages of documents already produced by the NRA in pending litigation. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Debtors object to this Request to the extent it is duplicative of other Requests, including Request No. 10. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

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REQUEST FOR PRODUCTION NO. 18:

Documents relating to communications between the NRA and Volkov and/or Cooper regarding termination of their services for the NRA.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors object to this Request as unduly burdensome, overbroad, vague, and ambiguous to the extent it uses the term “services for the NRA.” Debtors object to the Request as not reasonably calculated to lead to the discovery of admissible evidence. Debtors will not produce the documents demanded by this Request.

REQUEST FOR PRODUCTION NO. 19:

Documents reflecting all payments or transfers between the NRA and NRA Foundation since January 1, 2018.

RESPONSE:

Debtors object to this Request as unduly burdensome, overbroad, vague, and ambiguous to the extent it calls for documents reflecting “all payments or transfers.” Debtors object to the Request as not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

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REQUEST FOR PRODUCTION NO. 20:

Communications between the NRA and/or the Brewer Firm with any journalist or media outlet regarding the NRA, including but not limited to any NRA litigation or the NRA Bankruptcy since January 1, 2018.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors object to this Request as overbroad, unduly burdensome, irrelevant to the issues in these contested matters, and unlikely to lead to the discovery of admissible evidence. Debtors state that they will produce responsive, nonprivileged communications with media outlets regarding the NRA's bankruptcy.

REQUEST FOR PRODUCTION NO. 21:

Statements made by any employee, board member, executive, or representative of the NRA to any journalist or media outlet referring or related to the NRA Bankruptcy from January 15, 2021, to the present.

RESPONSE:

Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors object to this Request as unduly burdensome, overbroad, vague, and ambiguous to the extent it uses the terms "Statements made by any employee, board member, executive, or representative." Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Debtors object to the Request as not reasonably calculated to lead to the discovery of admissible evidence. Debtors object to this

Request to the extent it is duplicative of other Requests, including Request No. 20. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 22:

Documents and communications relating to NRA whistleblower complaints since January 1, 2018. This Request includes all documents and communications relating to Emily Cummins.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors object to the phrase “all documents and communications relating to Emily Cummins” as facially overbroad and unduly burdensome, encompassing thousands of pages of documents irrelevant to the issues in these contested matters, unlikely to lead to the discovery of admissible evidence, and invasive of employee-privacy rights. Debtors further object to the phrase “NRA whistleblower complaints” as vague and ambiguous; for purposes of its response, the Debtors will construe this Request to seek documents constituting or reflecting issues reported by NRA staff or vendors pursuant to the NRA’s whistleblower policy. Debtors further object to the Request to the extent that that it calls for the production of documents containing information that tends to reveal the identity of individuals entitled to whistleblower protections under the law and/or NRA policy; Debtors reserve right to redact documents in order to protect the identity of such individuals. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited

discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 23:

Former and current employment agreements between the NRA and any NRA Executive or other key person or high-level employee, including but not limited to LaPierre, Meadows, Cotton, Hallow, Frazer, Powell, Cox, Phillips, Spray, DeBergalis, or Schropp in place as of January 1, 2018, and any amendments executed thereafter.

RESPONSE:

Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors further object to the phrase “key person or high-level employee” as vague and ambiguous; for purposes of their response, Debtors will construe this Request to seek employment contracts between the NRA and the individuals enumerated in the Request. Debtors further object to this Request to the extent it demands documents subject to contractual confidentiality limitations. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 24:

Documents and communications relating to the NRA’s authorization by the NRA Board of Directors to form Sea Girt, LLC.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is

impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

REQUEST FOR PRODUCTION NO. 25:

Documents and communications relating to all statements, quotes, and “Wayne’s Letter” displayed on the website www.nraforward.org, including but not limited to (1) communications between Arulanadam and Carter, Brewer, or any employee of the Brewer Firm, and (2) any previous drafts of the content displayed on this website.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to this Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Debtors further object to this Request as cumulative and duplicative on the ground that it overlaps with Request No. 2 of the Requests for Production served contemporaneously by the NYAG; for purposes of its response, Debtors will provide AMc with copies of the same records produced to the NYAG in response to the NYAG’s Request No. 2.

REQUEST FOR PRODUCTION NO. 26:

Documents and communications supporting your contention that the NRA’s 2018 “top-to-bottom review of its operations and governance” revealed that “a relatively small group of vendors, executives and fiduciaries were not complying with the NRA policies and/or reporting requirements” as stated on page 13 of the NRA’s October 19, 2020 MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT THE NATIONAL RIFLE ASSOCIATION’S MOTION TO DISMISS in the NYAG Enforcement Action. This Request includes but is not limited to all documents and communications identifying each of the vendors, executives, and fiduciaries referenced by the NRA and the documents and information obtained by the NRA in 2018 supporting these contentions.

RESPONSE:

Debtors object to this Request to the extent that it purports to require the production, disclosure, or identification of information protected by attorney-client privilege, the work product doctrine, or similar privileges or exemptions from disclosure. Debtors object to the Request to the extent that it calls for the production of documents already in the possession of AMc. Debtors object to the Request as not reasonably calculated to lead to the discovery of admissible evidence. Debtors object to the Request to the extent that that it calls for the production of documents containing information that tends to reveal the identity of individuals entitled to whistleblower protections under the law and/or NRA policy and Debtors reserve right to redact documents in order to protect the identity of such individuals. Debtors object to the Request as unduly burdensome to the extent that it calls for a broad collection and review of ESI which is impractical and unnecessary for purposes of the present expedited discovery. Subject to and without waiving the foregoing objections and General Objections, Debtors will conduct a reasonably diligent, targeted search for responsive information in their possession, custody, or control.

Dated: March 4, 2021

Respectfully submitted,

/s/ Gregory E. Garman

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2021, a true and correct copy of the foregoing **Debtors Objections and Responses to Ackerman McQueen, Inc.'s, First Request for Production to Debtors** was served upon the persons and via the means set forth below.

/s/ Dylan T. Ciciliano

Via EMail:

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