

**From:** [Mordecai Geisler](#)  
**To:** [Thompson, Stephen](#)  
**Cc:** [Svetlana Eisenberg](#); [Stern, Emily](#); [Conley, Jonathan](#); [Connell, Monica](#); [James, Erica](#); [Serhiy Moshak](#); [Matthew Howard](#)  
**Subject:** Re: NYAG v. NRA - meet and confer request  
**Date:** Friday, January 7, 2022 11:27:55 PM

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Stephen: Thank you. We are in receipt. We are continuing review and production on a rolling basis. We will revert with further specifics regarding the below.

Regards

Mordecai

On Jan 7, 2022, at 8:07 PM, Thompson, Stephen  
<[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)> wrote:

Mordecai and Svetlana,

I am writing to follow up on my previous email. As I said during our meet and confer last month, I recognize and appreciate the work that has gone into the productions we have received thus far. That being said, as we have had an opportunity to review the productions, it has become increasingly clear—particularly with respect to the collection and production of non-email documents and the categories of documents we have repeatedly discussed since last September—that the NRA’s responses to our document requests are inadequate.

One of the reasons we requested a rolling production was in order to assess the adequacy of the NRA’s production in real time to meet and confer sooner rather than later on how to address issues. Instead, the NRA has left us little time to meaningfully review the productions ahead of the start of fact witness depositions. Without waiving other objections as to the adequacy of the production, below I highlight some areas where the prejudice to us is most acute, and where we need responses ASAP in light of the depositions starting next week.

- **SendInc.** The NRA’s recent productions are rife with messages sent to/from NRA board members on the Audit and Finance Committees using the SendInc encrypted messages service. We have raised our concerns and issues regarding this service since **December of 2019**, see the attached email that I sent to Sarah and Svetlana at that time. To the best of our knowledge, the NRA’s productions do not otherwise contain the documents that are referenced in these SendInc transmittal emails. Please let us know ASAP (1) whether the documents referenced in these emails can be found elsewhere in the NRA’s productions and, if so, where; and (2) if they are not found in the NRA’s productions, what, if anything, the NRA has done to preserve, collect, review, and produce documents

transmitted via SendInc over the past several years.

- **Mr. Spray's termination.** We requested all documents concerning Mr. Spray's termination as an NRA employee (see requests 7 and 8 in our first set of requests). The NRA's production does not appear to contain any documents concerning any negotiations over Mr. Spray's termination, or anything above and beyond what was produced in the bankruptcy on this subject. Is that because there have been no documents on this subject since the bankruptcy concluded? Is there a final, signed termination agreement with Mr. Spray? Has the NRA made any post-employment payments to Mr. Spray and, if so, pursuant to what agreement? Please inform us whether these and other documents related to the termination of Mr. Spray's employment relationship have been produced. If not, why not?
- **Fundraising metrics.** We requested documents concerning the NRA's fundraising metrics, including any cost/benefit analyses performed by or regarding the Office of Advancement, and any analyses of Mr. LaPierre's contributions to the NRA as a fundraiser (see requests 37, 38, and 43 in our first set of requests). Thus far, other than a small number of emails from the Financial Services Division regarding the budget for the Office of Advancement, we have not seen any such analyses. If they have been produced, please point us to where we can find them in the production. If they have not, please confirm that they do not exist or otherwise produce them ASAP.
- **Incomplete email chains.** We have encountered several instances where we do not have the bottom most email in an email chain containing an attachment. For example, see NRA-NYAGCOMMDIV-00616214 and NRA-NYAGCOMMDIV-00617852. Please provide us with the bottom most email chains and confirm that there is no underlying issue that resulted in the exclusion of other emails containing attachments.
- **Mr. Powell's and Mr. Cox's documents.** Please let us know ASAP what procedures are in place for the review and production of Mr. Powell's and Mr. Cox's documents, and when we can expect to receive them.
- **Aronson documents.** Please let us know ASAP when we can expect to receive the Aronson documents I discussed in my last email.
- **Text messages.** As we noted with respect to Ms. Hallow's text messages last October, we do not believe that the search terms we negotiated (which were only intended to be used on email ESI) are sufficient to capture responsive text messages for key custodians. This has been borne out by the limited number of text messages we are seeing in the recent productions. So, in light of the clawback agreement we have in place, and without waiving any right to revisit the text messages, we request that you produce all of the text messages

between and/or among the following custodians for the period June 1, 2017 to the present, including any texts to/from/including non-custodians or Gurney Sloan and Peyton Knight, subject to the privilege review terms that you are using:

- Millie Hallow
- Carolyn Meadows
- Charles Cotton
- Willes Lee
- Susan LaPierre
- Wayne LaPierre
- Craig Spray
- Lisa Supernaugh
- Andrew Arulanandam
- Joe DeBergalis
- Tyler Schropp
- Sonya Rowling
- Rick Tedrick
- Josh Powell
- Woody Phillips
- Andra Fischer
- Vanessa Shahidi
- Joel Friedman
- Paul Payne
- Ed Worley
- David Halbrook
- Kayne Robinson
- Bill Miller

Sincerely,  
Stephen

**Stephen C. Thompson | Assistant Attorney General**

New York State Office of the Attorney General  
28 Liberty Street, New York, NY 10005  
Tel: (212) 416-6183 | [Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)

---

**From:** Thompson, Stephen

**Sent:** Tuesday, January 4, 2022 11:07 PM

**To:** Mordecai Geisler <mxg@brewerattorneys.com>

**Cc:** Stern, Emily <Emily.Stern@ag.ny.gov>; Conley, Jonathan <Jonathan.Conley@ag.ny.gov>; Connell, Monica <Monica.Connell@ag.ny.gov>; James, Erica <Erica.James@ag.ny.gov>; Serhiy Moshak <ssm@brewerattorneys.com>; Matthew Howard <mjh@brewerattorneys.com>

**Subject:** RE: NYAG v. NRA - meet and confer request

Mordecai,

I am writing to follow up on some of the issues we discussed during our last meet and confer, as well as a few other discovery related items. We will address the questions you had for us during the meet and confer in a separate email.

**SendInc.** During the meet and confer, I discussed the issue we have encountered in the recent productions and the productions going back to the investigation where documents are sent by/to NRA staff and board members using the SendInc secure message service. Has the NRA preserved and produced documents sent to the Board and Committees thereof using SendInc? We have also been asking for categories of documents like the packets of information provided to Board and Committee members and asked for them in our document demands. Can you please let us know as soon as possible whether the NRA has preserved and produced such information and, if so, where in the productions we may find it.

**Brewer documents.** I also discussed our requests for non-privileged documents related to Brewer's services (Requests 21, 31, and 32 in our first requests for production). As of our meet and confer, you were still in the process of reviewing those documents. As you know, the time for the NRA's document production has passed. We will need these documents produced sufficiently in advance of the upcoming depositions to meaningfully review and digest them. Without waiving objection to their late production, please let us know when we can expect those documents.

**Aronson documents.** Thank you for the update you provided to us about the NRA's review of Aronson's documents during the meet and confer. Can you please let us know whether you have collected and reviewed, in response to Request 23 in our first requests, emails between your firm and Aronson or its counsel for production? Can you please let us know when can we expect those documents?

**Mr. Powell's documents.** Following up on the December 10 status conference, please let us know what arrangements you have made with Mr. Powell's counsel regarding the production of his documents, and when we can expect to receive them.

**Privilege Log:** At our meet and confer, you indicated that you had no projected date for production of the NRA's privilege log. This is prejudicial to the Plaintiff. Can you please confirm that the NRA has begun the privilege log, how far the NRA has gotten in terms of completing its privilege log, and when we can expect to receive the privilege log?

**Mr. Spray's personal device.** Following up on Yael's email of earlier today, please let us know as soon as possible the answers to her questions regarding Mr. Spray's personal device.

Best,  
Stephen

**Stephen C. Thompson | Assistant Attorney General**

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28 Liberty Street, New York, NY 10005  
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---

**From:** Thompson, Stephen

**Sent:** Wednesday, December 22, 2021 7:06 PM

**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>; Matthew Howard <[mjh@brewerattorneys.com](mailto:mjh@brewerattorneys.com)>

**Subject:** RE: NYAG v. NRA - meet and confer request

Mordecai,

Thank you for the call this afternoon. To immediately address a few of the outstanding items:

- If you could please send us the contact information for Mr. Spray's counsel, or introduce us by email, we would appreciate it.
- Aronson\_NRA0003562 is an example of the Aronson document that we mentioned on the call today.
- NRA-NYAGCOMMDIV-00283371 is an example of the Send Inc. transmittal emails we mentioned on the call.

Thank you,  
Stephen

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**From:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>

**Sent:** Wednesday, December 22, 2021 2:01 PM

**To:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>; Matthew Howard <[mjh@brewerattorneys.com](mailto:mjh@brewerattorneys.com)>

**Subject:** RE: NYAG v. NRA - meet and confer request

Stephen: Topics for the call will also include:

- OAG objections to NRA's RFPs

- OAG objections to NRA's notices of deposition
- Dates of Staples and LaPierre depositions

Regards,

**Mordecai Geisler | Counsel**  
**Brewer, Attorneys & Counselors**  
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New York, New York 10022  
Office Main: 212.489.1400  
Office Direct: 212.224.8813  
[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)

---

**From:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>  
**Sent:** Tuesday, December 21, 2021 12:50 PM  
**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>  
**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>  
**Subject:** Re: NYAG v. NRA - meet and confer request

Three works, thank you.

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**From:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>  
**Sent:** Tuesday, December 21, 2021 12:40:23 PM  
**To:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>  
**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>  
**Subject:** RE: NYAG v. NRA - meet and confer request

Would 3pm work? Or later than 4?

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**From:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>

**Sent:** Tuesday, December 21, 2021 12:22 PM

**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>

**Subject:** Re: NYAG v. NRA - meet and confer request

Mordecai,

Apologies but would sometime between 2 and 3 work for you? We can make 4 work if not.

And one more addition to the agenda from our side, we would like to discuss the R&Os to the OAG's second requests.

Thank you,  
Stephen

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**From:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>

**Sent:** Tuesday, December 21, 2021 11:16:40 AM

**To:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>; Serhiy Moshak <[ssm@brewerattorneys.com](mailto:ssm@brewerattorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>

**Subject:** RE: NYAG v. NRA - meet and confer request

Stephen: Thank you. Would 4pm tomorrow work for you?

Regards,

**Mordecai Geisler | Counsel**  
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Office Main: 212.489.1400  
Office Direct: 212.224.8813  
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---

**From:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>

**Sent:** Monday, December 20, 2021 4:04 PM

**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>  
**Subject:** RE: NYAG v. NRA - meet and confer request

Mordecai,

One additional item we would like to add to the topics for discussion on Wednesday is the NRA's review of Aronson's documents, and when you expect that review to conclude. In terms of the time for our call, is there a time Wednesday afternoon that would be more convenient for you?

Thank you,  
Stephen

**Stephen C. Thompson | Assistant Attorney General**

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28 Liberty Street, New York, NY 10005  
Tel: (212) 416-6183 | [Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)

---

**From:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>

**Sent:** Friday, December 17, 2021 7:37 PM

**To:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>

**Subject:** RE: NYAG v. NRA - meet and confer request

Stephen: We are available next Wednesday. We will forward a list of topics we would like to discuss ahead of the call. Thank you.

Regards,

**Mordecai Geisler | Counsel**  
**Brewer, Attorneys & Counselors**  
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New York, New York 10022  
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[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)

---

**From:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>

**Sent:** Friday, December 17, 2021 1:19 PM

**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg



<[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan

<[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James,

Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>

**Subject:** RE: NYAG v. NRA - meet and confer request

Thank you, Mordecai. We are available next Monday or Wednesday to speak. In terms of topics, we would like to discuss the following:

- The current status of the NRA's production (whether we can expect additional documents, what remains to be reviewed/produced).
- We would like to walk through the OAG's document demands, and what has or has not been produced in response to each.
- The status of the categories of documents we have requested be produced.
- When we can expect the NRA's privilege log.
- The OAG's deposition notices.

Best,

Stephen

**Stephen C. Thompson | Assistant Attorney General**

New York State Office of the Attorney General

28 Liberty Street, New York, NY 10005

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---

**From:** Mordecai Geisler <[mvg@brewerattorneys.com](mailto:mvg@brewerattorneys.com)>

**Sent:** Friday, December 17, 2021 12:06 PM

**To:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>; Svetlana Eisenberg

<[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@BrewerAttorneys.com](mailto:djp@BrewerAttorneys.com)>

**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan

<[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James,

Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>

**Subject:** RE: NYAG v. NRA - meet and confer request

**[EXTERNAL]**

Stephen: Thank you. Apologies. We have been working on a number of matters in the case. We think it would make more sense to have a call early next week. Can we have a sense of what issues you want to discuss, and we will do the same?

Regards,

**Mordecai Geisler | Counsel**

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**From:** Thompson, Stephen <[Stephen.Thompson@ag.ny.gov](mailto:Stephen.Thompson@ag.ny.gov)>  
**Sent:** Friday, December 17, 2021 11:05 AM  
**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@brewerattorneys.com](mailto:djp@brewerattorneys.com)>  
**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>  
**Subject:** RE: NYAG v. NRA - meet and confer request

Mordecai and Svetlana,

Following up on this, please let us know if you are available this afternoon to speak.

**Stephen C. Thompson | Assistant Attorney General**

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---

**From:** Thompson, Stephen  
**Sent:** Thursday, December 16, 2021 11:04 AM  
**To:** Mordecai Geisler <[mxg@brewerattorneys.com](mailto:mxg@brewerattorneys.com)>; Svetlana Eisenberg <[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)>; David Partida <[djp@brewerattorneys.com](mailto:djp@brewerattorneys.com)>  
**Cc:** Stern, Emily <[Emily.Stern@ag.ny.gov](mailto:Emily.Stern@ag.ny.gov)>; Conley, Jonathan <[Jonathan.Conley@ag.ny.gov](mailto:Jonathan.Conley@ag.ny.gov)>; Connell, Monica <[Monica.Connell@ag.ny.gov](mailto:Monica.Connell@ag.ny.gov)>; James, Erica <[Erica.James@ag.ny.gov](mailto:Erica.James@ag.ny.gov)>  
**Subject:** NYAG v. NRA - meet and confer request

Mordecai and Svetlana,

Are you available tomorrow for a meet and confer on the NRA's document production?  
We are generally available if there is a time that would be more convenient for you.

Best,  
Stephen

**Stephen C. Thompson | Assistant Attorney General**

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