

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF
THE STATE OF NEW YORK,

Plaintiff,

-against-

THE NATIONAL RIFLE ASSOCIATION OF
AMERICA, WAYNE LAPIERRE, WILSON
PHILLIPS, JOHN FRAZER, and JOSHUA
POWELL,

Defendants.

INDEX NO.: 451625/2020

Relates to Motion Seq. No. 25

NOTICE OF
CROSS-MOTION

PLEASE TAKE NOTICE that upon the attached affirmation of Svetlana M. Eisenberg dated February 22, 2022, the accompanying Memorandum of Law in support of this motion and the exhibits attached thereto, and upon all the pleadings and proceedings in this action to date, Defendant, The National Rifle Association of America, cross-move this Court at 9:30 a.m. on March 1, 2022 at the New York County Supreme Court located at 60 Centre Street, New York, New York, 10007, Motions and Submissions Part, Room 130, or as soon thereafter as counsel may be heard for an order pursuant to CPLR § 3124 directing Everytown for Gun Safety Action Fund, Inc. to respond to the NRA's Amended Subpoena *Duces Tecum* and *Ad Testificandum* dated January 7, 2022, and for such other and further relief as the Court deems just and proper.

An affirmation that a good faith effort has been made to resolve the issues raised in this motion is attached.

Dated: February 22, 2022
New York, New York

Respectfully submitted,

By: /s/ Svetlana M. Eisenberg
William A. Brewer III

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**ATTORNEYS FOR DEFENDANT
THE NATIONAL RIFLE ASSOCIATION
OF AMERICA**

TO: All Counsel of Record (via NYSCEF)