

EXHIBIT 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORKPEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK,

Plaintiff,

v.

THE NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC., WAYNE LAPIERRE, WILSON
PHILIPS, JOHN FRAZER, and JOSHUA POWELL,

Defendants.

Index No. 451625/2020

AMENDED
ORDER

Upon review of the documents provided me for *in camera* review, I have determined that all withheld documents shall be produced EXCEPT the following with the last three bates numbers:

Category 2: -263, -934, -922, -910

Category 3: -912

Grounds for the rulings appear below.

CATEGORY 1

<u>Bates</u>	<u>Date</u>	<u>Description</u>	<u>Ground</u>
687	20-11-05	Form 1099, Sch. L & Pt. V	Waived
684	20-11-05	Sch. O	Waived
638	20-11-04	Form 1099, Sch. L & Pt. V	Waived
631	20-11-04	Sch. O	Waived
847	20-11-18	Form 990	Not privileged
850	20-11-18	Form 990-T	Not privileged

856	20-11-18	Form 990	Not privileged
849	20-11-18	Final 990 with emails	Not privileged
842	20-11-18	Final 990-T	Not privileged
846	20-11-18	Final 990	Not privileged
844	20-11-18	Form 990	Not privileged
843	20-11-18	Form 990-T	Not privileged
845	20-11-18	Form 990	Not privileged

CATEGORY 2

<u>Bates</u>	<u>Date</u>	<u>Description</u>	<u>Ground</u>
263	21-8-19	Legal advice re: bequest	Privileged
934	21-4-21	Legal advice re: bequest	Privileged
922	21-4-21	Legal advice re: bequest	Privileged
910	21-4-17	Legal advice re: bequest	Privileged
205	19-9-17	Settlement memo	Not privileged

CATEGORY 3

<u>Bates</u>	<u>Dates</u>	<u>Description</u>	<u>Ground</u>
912	20-1-30	Brewer Invoice	Privileged


CATEGORY 4

<u>Bates</u>	<u>Date</u>	<u>Description</u>	<u>Ground</u>
164	21-6-13	Aronson fees. pdf & xlsx (bankruptcy)	Not privileged
618	21-3-6	Aronson fees (bankruptcy)	Not privileged

617	21-3-6	Aronson fees (bankruptcy)	Not privileged
612	21-3-6	Aronson fees (bankruptcy)	Not privileged
619	21-3-6	Aronson fees (bankruptcy)	Not privileged

Dated: New York, New York
April 12, 2022

SO ORDERED:


Hon. O. Peter Sherwood (Ret.)

From: [Peter Sherwood](#)
To: [Fuchs, Yael](#)
Cc: [Connell, Monica](#); [Michelle R. Stephens](#); [M Macdougall](#); [M Werbner](#); [Stern, Emily](#); [W Fleming](#); [S Farber](#); [T McLish](#); [Kent](#); [H Evans](#); [Samantha Block](#); [Loegering, Becca](#); [Svetlana Eisenberg](#); [Philip Furia](#)
Subject: RE: People of the State of New York v. National Rifle Association of America, Inc., et al.
Date: Tuesday, April 12, 2022 8:43:10 AM
Attachments: [image001.png](#)
[image003.png](#)

Coinsel.

My apologies.

The following documents are not privileged: -205 (handwritten calculation of settlement payment) and -164, -618, -617, -612, -619 (accountants billings).



Peter Sherwood

Senior counsel



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From: Fuchs, Yael <Yael.Fuchs@ag.ny.gov>

Sent: Tuesday, April 12, 2022 9:14 AM

To: Peter Sherwood <psherwood@ganfershore.com>

Cc: [Connell, Monica](#) <Monica.Connell@ag.ny.gov>; [Michelle R. Stephens](#) <mstephens@ganfershore.com>; [M Macdougall](#) <mmacdougall@akingump.com>; [M Werbner](#) <mwerbner@werbnerlaw.com>; [Stern, Emily](#) <Emily.Stern@ag.ny.gov>; [W Fleming](#) <wfleming@gagespencer.com>; [S Farber](#) <sfarber@winston.com>; [T McLish](#) <tmclish@akingump.com>; [Kent](#) <kent@correlllawgroup.com>; [H Evans](#) <hevans@akingump.com>; [Samantha Block](#) <samantha.block@akingump.com>; [Loegering, Becca](#) <rloegering@winston.com>; [Svetlana Eisenberg](#) <sme@brewerattorneys.com>; [Philip Furia](#) <pjf@brewerattorneys.com>

Subject: FW: People of the State of New York v. National Rifle Association of America, Inc., et al.

Justice Sherwood:

I write to request clarification regarding your determinations in the attached Order regarding documents withheld by Aronson at the direction of the NRA. The top part of the Order lists certain documents that do not need to be produced, but six of those documents are listed in the body of the Order as "Not Privileged." These documents are those ending in the following bates numbers:

Category 2: 205

Category 4: 164, 618, 617, 612, 619.

We respectfully request clarification as to whether you are ordering that the documents ending in those bates numbers be produced, and if not, on what grounds.

Best,
Yael

Yael Fuchs | Assistant Attorney General

Co-Chief, Enforcement Section, Charities Bureau

New York State Office of the Attorney General

28 Liberty Street, New York, NY 10005

Tel: (212) 416-8391 | yael.fuchs@ag.ny.gov

From: Connell, Monica <Monica.Connell@ag.ny.gov>

Sent: Monday, April 11, 2022 2:58 PM

To: Sheehan, James <James.Sheehan@ag.ny.gov>; Fuchs, Yael <Yael.Fuchs@ag.ny.gov>; Sash, Sharon <Sharon.Sash@ag.ny.gov>; Stern, Emily <Emily.Stern@ag.ny.gov>; Wang, William <William.Wang@ag.ny.gov>; Conley, Jonathan <Jonathan.Conley@ag.ny.gov>; James, Erica <Erica.James@ag.ny.gov>; Thompson, Stephen <Stephen.Thompson@ag.ny.gov>; Sargent, Nina <Nina.Sargent@ag.ny.gov>

Subject: FW: People of the State of New York v. National Rifle Association of America, Inc., et al.

From: Donna A. Bouknight <dbouknight@ganfershore.com>

Sent: Monday, April 11, 2022 2:39 PM

To: Connell, Monica <Monica.Connell@ag.ny.gov>; Michelle R. Stephens <mstephens@ganfershore.com>; M Macdougall <mmacdougall@akingump.com>; M Werbner <mwerbner@werbnerlaw.com>; Stern, Emily <Emily.Stern@ag.ny.gov>; Mordecai Geisler <mxg@brewerattorneys.com>; W Fleming <wfleming@gagespencer.com>; S Farber <sfarber@winston.com>; T McLish <tmclish@akingump.com>; Kent <kent@correlllawgroup.com>; H Evans <hevans@akingump.com>; Samantha Block <samantha.block@akingump.com>; Loegering, Becca <loegering@winston.com>; Svetlana Eisenberg <sme@brewerattorneys.com>; Serhiy Moshay <ssm@brewerattorneys.com>

Cc: Peter Sherwood <psherwood@ganfershore.com>

Subject: People of the State of New York v. National Rifle Association of America, Inc., et al.

[EXTERNAL]

Counsel,

Attached please find my order relating to withheld NRA documents in the possession of Aronson LLC.

Very truly yours,

O. Peter Sherwood/dab

Donna A. Bouknight

Legal Secretary



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