FILED: NEW YORK COUNTY CLERK 04/18/2022 11:46 PM

NYSCEF DOC. NO. 630

INDEX NO. 451625/2020

RECEIVED NYSCEF: 04/18/2022

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

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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

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the attached affirmation of Svetlana M. Eisenberg dated April 18, 2022, the accompanying memorandum of law in support of this motion, and upon all the pleadings and proceedings in this action to date, The National Rifle Association of America, by undersigned counsel, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, New York 10007, at 9:30 a.m. on May 6, 2022, or as soon thereafter as counsel may be heard, for an order under CPLR 3104(d) reversing rulings by the Special Master for Discovery that the privileges applicable to the Documents (as the term is defined in the motion) were waived and ordering such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that absent Court order or the parties' agreement otherwise stating, answering papers, if any, are due to be served electronically at least seven days before the return date herein.

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INDEX NO. 451625/2020

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

Dated: April 18, 2022 Respectfully submitted,

By: /s/ Svetlana M. Eisenberg
Svetlana M. Eisenberg
sme@brewerattorneys.com
Joshua M. Dillon
jdd@brewerattorneys.com

BREWER, ATTORNEYS & COUNSELORS

750 Lexington Avenue, 14th Floor New York, New York 10022 Telephone: (212) 489-1400 Facsimile: (212) 751-2849

ATTORNEYS FOR DEFENDANT THE NATIONAL RIFLE ASSOCIATION

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NYSCEF DOC. NO. 630

INDEX NO. 451625/2020

RECEIVED NYSCEF: 04/18/2022

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion and related documents was electronically served via the Court's electronic case filing system upon all counsel of record on April 18, 2022.

/s/ Svetlana M. Eisenberg
Svetlana M. Eisenberg