

Exhibit D

Page 1

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

3 PEOPLE OF THE STATE OF)
NEW YORK, BY LETICIA)
4 JAMES ATTORNEY GENERAL OF) Index No.
THE STATE OF NEW YORK,) 451625/2020

5)
Plaintiffs,)

6) VIDEOCONFERENCE/
vs.) VIDEOTAPED

7)
THE NATIONAL RIFLE) DEPOSITION OF
8 ASSOCIATION OF AMERICA,)
INC., WAYNE LAPIERRE,) PETER R. BROWNELL
9 WILSON PHILLIPS, JOHN)
FRAZER, AND JOSHUA POWELL)

10)
Defendants.)

11)
-----)

12 THE VIDEOCONFERENCE/VIDEOTAPED
13 DEPOSITION OF PETER R. BROWNELL, taken before
14 Gale Sweeney Christensen, Certified Shorthand
15 Reporter, Registered Professional Reporter,
16 and Notary Public of the State of Iowa,
17 commencing at 9:37 a.m., October 1, 2021, at
18 Suite 3300, 801 Grand Avenue, Des Moines,
19 Iowa.

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24 Reported by: Gale Sweeney Christensen,
CSR, RPR

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1 other questioning is finished.

2 The only thing I'll say
3 additionally in response to what the NRA's
4 Counsel is is that discussions about
5 rescheduling or continuing this deposition
6 need to include all of the parties. It's not
7 just an issue for the NRA to work out with
8 the Attorney General's Office.

9 MS. EISENBERG: Absolutely agreed.

10 MR. KLINEFELDT: And I think that's
11 everybody except me; is that correct?

12 MS. CONNELL: And then I want to.
13 Thank you.

14 MR. KLINEFELDT: Yes, and we'll let
15 Ms. Connell finish.

16 So we are now -- it's 6:17 Central
17 Standard Time. We started the deposition at
18 9:00. It was scheduled to start at 9:00.
19 Anyway, Mr. Brownell has been here since
20 9:00. And, you know, we'd asked that it --
21 we be done by 5:00. That would be eight
22 hours with some reasonable lunch and restroom
23 breaks.

24 Mr. Brownell has been here now for
25 over nine hours excluding a half-hour lunch

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1 break and a few short restroom breaks. He
2 accepted service of this subpoena. He then
3 agreed to reschedule the deposition at the
4 State's request to give them additional time
5 and was happy to accommodate that.

6 However, we are now at -- and we
7 had asked, when accepting service of that
8 subpoena, that the State reach out to the
9 parties to help coordinate if they were going
10 to have questions or wanted to depose him.
11 It's my understanding the State had made good
12 on that effort and did not hear anything
13 back. But we have now been here on the
14 record now for over seven hours, and that
15 does not include the thirty-six minutes that
16 should be tacked onto that from 9 a.m. to
17 9:36 a.m. this morning while we were dealing
18 with the State's document issues.

19 And so it is -- it is my position
20 that Mr. Brownell should be done being
21 deposed now. We are objecting to the holding
22 open of this deposition or any further
23 reservations for cross-examination and would
24 be objecting to any further depositions of
25 Mr. Brownell in this case.