COUNTY CLERK 07/18/2022

NYSCEF DOC. NO. 772

INDEX NO. 451625/2020

RECEIVED NYSCEF: 07/18/2022

## SUPREME COURT OF THE STATE OF NEW YORK **COUNTY OF NEW YORK COMMERCIAL DIVISION**

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

*ଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊଊ* INDEX NO. 451625/2020

Plaintiff,

v.

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

NOTICE OF MOTION

Defendants.

PLEASE TAKE NOTICE that upon the annexed Affirmation of Svetlana M. Eisenberg, dated July 18, 2022, and the exhibits annexed thereto, and the Memorandum of Law, dated July 18, 2022July 18, 2022, in support of this motion, and all other papers, pleadings and proceedings in this action, the National Rifle Association of America (the "NRA"), by its undersigned counsel, will move this Court, 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. EST on Wednesday, August 3, 2022, or as soon thereafter as counsel may be heard, for an Order (i) compelling within 20 days of the Order the depositions of (a) Commercial Division Rule 11-f representative of the Office of the Attorney General; and (b) James Sheehan; and (ii) granting any other relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR § 2214(b), any opposition must be filed at least seven (7) days before the return date of this motion.

Dated: July 18, 2022

FILED: NEW YORK COUNTY CLERK 07/18/2022 10:57 PM INDEX NO. 451625/2020

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Respectfully submitted,

By: <u>/s/ Svetlana M. Eisenberg</u>

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COUNSEL FOR THE NATIONAL RIFLE ASSOCIATION OF AMERICA