

**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,**

Plaintiff,

v.

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

Defendants.

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INDEX NO. 451625/2020

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Affirmation of Svetlana M. Eisenberg, dated July 22, 2022, and the exhibits annexed thereto, and the Memorandum of Law, dated July 22, 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 Monday, August 8, 2022, or as soon thereafter as counsel may be heard, for an Order (i) vacating and reversing the Special Master’s discovery order dated July 15, 2022 to the extent it holds that the Documents (as that term is defined in the Memorandum of Law) are discoverable and must be produced; 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 22, 2022

Respectfully submitted,

By: /s/ Svetlana M. Eisenberg

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