

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

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<b>PEOPLE OF THE STATE OF NEW</b>	:	Index No.: 451625/2020
<b>YORK,</b>	:	
	:	Hon. Joel M. Cohen
<i>Plaintiff,</i>	:	
	:	
<b>v.</b>	:	
	:	<b>NOTICE OF MOTION</b>
<b>THE NATIONAL RIFLE ASSOCIATION</b>	:	
<b>OF AMERICA, INC., ET AL.,</b>	:	
	:	
<i>Defendants.</i>	:	
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**PLEASE TAKE NOTICE** that, upon the accompanying affirmation of Svetlana M. Eisenberg, dated November 25, 2022, the exhibits attached thereto, the accompanying memorandum of law in support of this motion, dated November 25, 2022, 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 10:30 a.m. on December 5, 2022, or as soon thereafter as counsel may be heard, for an order (I) permitting under 22 N.Y.C.R.R. § 216.1 the filing under seal of (i) the Frenkel Report (NYSCEF 894); and (ii) other portions of the NYAG's submissions to the Court (NYSCEF 892, 893) to the extent they refer to the substance of the Frenkel report, and (II) ordering such other relief as the Court deems just and proper.

Dated: November 25, 2022

Respectfully submitted,

By: /s/ Svetlana M. Eisenberg  
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**COUNSEL FOR DEFENDANT**

**THE NATIONAL RIFLE ASSOCIATION**