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NYSCEF DOC. NO. 981

INDEX NO. 451625/2020

RECEIVED NYSCEF: 12/21/2022

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	8 8	
STATE OF NEW YORK,	§	
,	§	INDEX NO. 451625/2020
Plaintiff,	§	
	§	NOTICE OF MOTION
v.	§	
	§	
THE NATIONAL RIFILE	§	
ASSOSICATION OF AMERICA,	§	
WAYNE LAPIERRE, WILSON	§	
PHILLIPS, JOHN FRAZER, and	§	
JOSHUA POWELL,	§	
	§	
Defendants.	§	

THE NATIONAL RIFLE ASSOCIATION OF AMERICA'S NOTICE OF MOTION PURSUANT TO CPLR 3104(d) FOR REVIEW OF THE SPECIAL MASTER'S RULINGS DATED NOVEMBER 29, 2022 PERTAINING TO THE NYAG'S PRIVILEGE LOG AND PRODUCTION OF RECORDS

PLEASE TAKE NOTICE that upon the annexed Affirmation of Svetlana M. Eisenberg, dated December 20, 2022, the exhibits annexed thereto, and all other papers, pleadings and proceedings in this action and for the reasons stated in the memorandum of law in support of this motion, pursuant to CPLR 3104(d), the National Rifle Association of America ("NRA") will seek at the Supreme Court of the State of New York, Motion Submission Part at 60 Centre Street, Room 130, New York, New York 10007, at 9:30 a.m. on January 17, 2023, or on such other date as the Court deems appropriate an order from the Court vacating certain portions of the Special Master's Decision dated November 29, 2022, with regard to the NYAG's privilege log and production of records.

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PLEASE TAKE NOTICE that, by agreement of the parties and subject to any order of the Court, any opposition to the motion is due on or before January 10, 2023, or at such other time as set by the Court.

Dated: December 20, 2022

Respectfully Submitted,

By: /s/ Svetlana M. Eisenberg

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