

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

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.

Index No. 451625/2020

Hon. Joel M. Cohen

Motion Seq. No. 37

PLEASE TAKE NOTICE that upon the annexed Affirmation of Stephen Thompson, dated December 20, 2022, the exhibits annexed thereto, and the Memorandum of Law, dated December 20, 2022, in support of this motion, and all other papers, pleadings and proceedings in this action, the People of the State of New York, by their 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, January 11, 2023, or as soon thereafter as counsel may be heard, pursuant to CPLR 3104(d) for review and reversal of the Special Master's order: (i) requiring the production of documents relating to the Office of the Attorney General's communications with sister law enforcement agencies; and (ii) to the extent it found that certain communications between defendant The National Rifle Association of America and third parties were protected by the attorney-client privilege; and (iii) granting any other relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any opposition must be filed on or before Tuesday, January 10, 2023.

Dated: December 20, 2022
New York, New York

LETITIA JAMES
Attorney General of the State of New York

/s/ Stephen Thompson

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