

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

**ADDENDUM TO NOTE OF
ISSUE AND CERTIFICATE
OF READINESS**

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Pursuant to the December 21, 2022 Order of the Hon. Joel M. Cohen (NYSCEF 997) and Rule 202.21(d) of the New York Rules of Court, Plaintiff hereby files the Note of Issue and Certificate of Readiness under the condition that the following discovery proceedings are ongoing and should continue post-Note of Issue:

- Plaintiff People of the State of New York by Letitia James, Attorney General of the State of New York, may move for relief in connection with the matters raised in Plaintiff's October 20, 2022 application to the Special Master, including but not limited to those pertaining specifically to undisclosed documents which were addressed in the Special Master's November 29, 2022 decision (the "Decision") holding that information Defendant The National Rifle Association of America ("NRA") has withheld from discovery as privileged that relate to matters the NRA has placed at issue and the NRA's "good faith" defense in this action are presumptively discoverable. *See* Ruling of Special Master, dated November 29, 2022, at 2-8 (discussing Plaintiff's motion to compel). Plaintiff may seek to obtain specific orders of preclusion, *in limine* or evidentiary rulings relating to the admissibility of evidence on such issues, to permit further documentary and testimonial discovery or such other relief as this Court deems just, proper and appropriate, if any. In addition, as part of its review of withheld documents, the NRA has de-designated documents as privileged and must continue to produce such documents to the Plaintiff.
- Plaintiff and the NRA may proceed with appeals relating to the Special Master's November 29, 2022 decision, or any subsequent ruling modifying or reconsidering the Decision and may proceed with any proceedings relating to or arising from rulings on such appeals.

Dated: New York, New York
December 22, 2022



Monica Connell