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NYSCEF DOC. NO. 1006

INDEX NO. 451625/2020

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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,
NOTICE OF MOTION

V.
STHE NATIONAL RIFLE
ASSOSICATION OF AMERICA,
WAYNE LAPIERRE, WILSON
PHILLIPS, JOHN FRAZER, and
JOSHUA POWELL,
STATE OF NEW
STA

Defendants.

NOTICE OF MOTION

PLEASE NOTICE Affirmation TAKE that upon the annexed Svetlana M. Eisenberg, dated December 29, 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 19, 2023, or on such other date as the Court deems appropriate, an order from the Court vacating a decision by the Special Master for Discovery, the Honorable O. Peter Sherwood, dated December 21, 2022, denying the NRA's request to compel the NYAG to produce to the NRA the NYAG's communications with an unidentified law enforcement agency about her office's investigation of the NRA.

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PLEASE TAKE NOTICE that, subject to any order of the Court, any opposition to the

motion is due on, or before, January 13, 2023, or at such other time as set by the Court.

Dated: December 29, 2022

Respectfully submitted,

By: <u>/s/ Svetlana M. Eisenberg</u>

William A. Brewer III wab@brewerattorneys.com Svetlana M. Eisenberg sme@brewerattorneys.com Noah B. Peters nbp@brewerattorneys.com

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COUNSEL FOR THE NATIONAL RIFLE ASSOCIATION OF AMERICA