

**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.

[illegible]

INDEX NO. 451625/2020

Hon. Joel M. Cohen

DEMAND FOR TRIAL BY JURY

PLEASE TAKE NOTICE that Plaintiff People of the State of New York, by Letitia James, Attorney General of the State of New York (“Plaintiff”), filed a note of issue on December 22, 2022 (NYSCEF 1003), with a demand therein for trial by jury of some issues.

Therefore, the National Rifle Association of America (the “NRA”) hereby demands a trial by jury of all issues triable of right by a jury, including, but not limited to, issues of fact related to each element of (i) Plaintiff’s claims; and (ii) the NRA’s defenses. The NRA asserts this demand pursuant to, *inter alia*, (i) Section 2 of Article I of the Constitution of the State of New York; (ii) Section 18 of Article VI of the Constitution of the State of New York; (iii) Section 112(b)(1) of Not-For-Profit Corporation Law; and (iv) article 41 of Civil Practice Law and Rules (the “CPLR”) (including Sections 4101 and 4102 of the CPLR).

The NRA reserves all rights and waives none.

Dated: January 3, 2023

Respectfully submitted,

By: /s/ Svetlana M. Eisenberg

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**COUNSEL FOR THE NATIONAL RIFLE
ASSOCIATION OF AMERICA**

cc All Counsel of Record (via NYSCEF)