

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  
(Cohen, J.)

**Stipulation**

**WHEREAS**, on December 20, 2022, Plaintiff and Defendant The National Rifle Association of America (“NRA”) filed motions for review of aspects of the November 29, 2022 ruling by the Special Master for Discovery, which arose from applications by either Plaintiff or the NRA: (a) Motion Sequence No. 37 (NYSCEF Dkt. Nos. 955-980), which was noticed for return on January 10, 2023, with opposition papers by Plaintiff due seven days before the return date; (b) Motion Sequence No. 38 (NYSCEF Dkt. Nos. 936-951), which was noticed for return on January 11, 2023, with opposition papers by Defendant due on January 10, 2023; and (c) a third motion with the sequence number yet to be assigned (NYSCEF Dkt. Nos. 981-996), which was noticed for return on January 17, 2023 with opposition papers due on January 10, 2023 (collectively, the “Motions”);

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned counsel for the respective parties that:

1. The return date of the Motions will be on January 19, 2023 or such later date as the Court determines;
2. The Parties shall file opposition papers to the Motions by January 17, 2023;
3. In accordance with the Order for Appointment of a Special Master for Discovery, the Parties reserve the right to seek permission to file replies on the Motions.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation can be executed in counterparts and/or by using electronic, scanned or telefaxed signatures, with the same effect as original signatures.

**IN WITNESS WHEREOF**, this Stipulation is executed by counsel for the parties on January 6, 2023.

For Plaintiff

For Defendant The National Rifle  
Association of America

ATTORNEY GENERAL  
OF THE STATE OF NEW YORK

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