

B R E W E R
ATTORNEYS & COUNSELORS

January 9, 2023

VIA NYSCEF

Hon. Joel M. Cohen
Justice of the Supreme Court of the State of New York
Commercial Division, New York County
60 Centre Street
New York, NY 10007

Re: *People of the State of New York, by Letitia James, Attorney General of the State of New York v. The National Rifle Association of America et al.*,
Index No. 451625/2020 **[Request for Oral Argument]**

Dear Judge Cohen:

On behalf of Defendant the National Rifle Association of America (the “NRA”), I write to respectfully request oral argument regarding the Motion to Review the Special Master’s Ruling Dated December 27, 2022.

The Special Master’s ruling states that the NRA must “disclose to the plaintiff . . . the universe of documents referenced in its Categorical Privilege Log.” “Categorical Privilege Log” is a defined term that encompasses every document over which the NRA has asserted privilege. Thus, the Special Master’s ruling would potentially force the NRA to disclose every single document over which it has asserted any sort of privilege to its adversary in litigation, the New York Attorney General. That would be severely prejudicial. Given the potential sweep and prejudice of the Special Master’s ruling, along with the importance of the issue, oral argument would be of great benefit to the Court and to the parties.

The NRA therefore respectfully requests that the Court schedule oral argument pursuant to N.Y. Comp. Codes R. & Regs. tit. 22 § 202.8-f(b).

Respectfully submitted,

/s/ Noah Peters

Noah B. Peters

cc:

All parties to the case via ECF