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January 17, 2023

VIA NYSCEF

Honorable Joel M. Cohen
Justice of the Supreme Court of the State of New York State
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

Dear Justice Cohen:

On behalf of the Plaintiff, the People of the State of New York, the Office of the Attorney General of the State of New York ("OAG") respectfully writes to inform Your Honor that Plaintiff has elected to produce the documents at issue in Motion Sequence No. 40 to the parties.

In Motion Sequence No. 40, the National Rifle Association of America ("NRA") seeks review of the Special Master's December 21, 2022 ruling that communications between the OAG and other government agencies during the OAG's investigation of the NRA were privileged, insofar as that ruling related to the OAG's communications with a heretofore unidentified agency. NYSCEF 1009. These communications are irrelevant to any claims remaining in this action. Nevertheless, in light of the Special Master's ruling, the content of the communications and after notifying the other law enforcement agency, the OAG determined that the documents could be produced without violating any privileges, and produced the documents today.

Since the NRA's motion seeks no relief apart from the production of these documents, the NRA's motion is now moot.

Respectfully,

/s/ Monica Connell
Monica Connell
Assistant Attorney General

cc: All Counsel of Record