

**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,

INDEX NO. 451625/2020

NOTICE OF MOTION

v.

**THE NATIONAL RIFLE
ASSOCIATION OF AMERICA,
WAYNE LAPIERRE, WILSON
PHILLIPS, JOHN FRAZER, and
JOSHUA POWELL,**

Defendants.

PLEASE TAKE NOTICE that upon the attached affirmation of Svetlana M. Eisenberg dated January 25, 2023, the exhibits attached thereto, the accompanying memorandum of law in support of this motion, dated January 25, 2023, and upon all the pleadings and proceedings in this action to date, the National Rifle Association of America, by undersigned counsel, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, New York 10007, at 9:30 a.m. EST on February 10, 2023, or as soon thereafter as counsel may be heard, for an order permitting under 22 N.Y.C.R.R. § 216.1 the filing under seal of the document attached as Exhibit D to the affirmation of Monica Connell dated January 18, 2023.

Dated: January 25, 2023

Respectfully Submitted,

By: /s/ Svetlana M. Eisenberg

Svetlana M. Eisenberg
sme@brewerattorneys.com

BREWER, ATTORNEYS & COUNSELORS

750 Lexington Avenue, 14th
Floor New York, New York
10022 Telephone: (212) 489-
1400
Facsimile: (212) 751-2849

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