

**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 30, 2023 (the “Affirmation”), the exhibits attached thereto, the accompanying memorandum of law in support of this motion, dated January 30, 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 15, 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 in redacted form of portions of transcripts attached as exhibits to the Affirmation.

Dated: January 30, 2023

Respectfully Submitted,

By: /s/ Svetlana M. Eisenberg

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