

**PEOPLE OF THE STATE OF NEW
YORK, BY LETITIA JAMES,
ATTORNEY GENERAL OF THE STATE
OF NEW YORK,**

V.

Defendants.

Hon. Joel M. Cohen

MOTION SEQUENCE NO. 43

1 of 3

5. On January 30, 2023, the NRA filed its memorandum of law in support of its motion for a sealing order [NYSCEF 1135]. The memorandum of law was accompanied by an affirmation executed by me and dated January 30, 2023 [NYSCEF 1136].

6. Attached hereto are true and correct copies of the above-referenced reply affirmation of Mr. Peters and related exhibits filed under seal:

- a. A true and correct copy of the Reply Affirmation of Noah Peters dated January 23, 2023 [NYSCEF 1111] is attached as **Exhibit 1**.
- b. A true and correct copy of the Exhibit slip sheet for the first day of the NRA's corporate representative deposition, which took place on July 29, 2022, [NYSCEF 1112] is attached as **Exhibit 2**.
- c. A true and correct copy of the Exhibit slip sheet for the second day of the NRA's corporate representative deposition, which took place on August 9, 2022, [NYSCEF 1113] is attached as **Exhibit 3**.
- d. A true and correct copy of the Exhibit slip sheet for the third day of the NRA's corporate representative deposition, which took place on September 9, 2022, [NYSCEF 1114] is attached as **Exhibit 4**.
- e. A true and correct copy of the Exhibit slip sheet for Sonya Rowling's deposition [NYSCEF 1116] is attached as **Exhibit 5**.
- f. A true and correct copy of the Exhibit slip sheet for Charles Cotton's deposition [NYSCEF 1117] is attached as **Exhibit 6**.
- g. A true and correct copy of the Exhibit slip sheet for David Coy's deposition [NYSCEF 1118] is attached as **Exhibit 7**.
- h. A true and correct copy of the Exhibit slip sheet for Day 1 of Wayne LaPierre's deposition [NYSCEF 1119] is attached as **Exhibit 8**.

- i. A true and correct copy of the Exhibit slip sheet for Day 2 of Mr. LaPierre's deposition [NYSCEF 1120] is attached as **Exhibit 9**.
 - j. A true and correct copy of the Exhibit slip sheet for John Frazer's deposition [NYSCEF 1123] is attached as **Exhibit 10**.
 - k. A true and correct copy of the Exhibit slip sheet for Willes Lee's deposition [NYSCEF 1124] is attached as **Exhibit 11**.
7. A true and correct copy of an email message from Assistant Attorney General William Wang to me, dated March 17, 2022, is attached as **Exhibit 12**. In the email message, the NYAG agrees not to challenge the NRA's designation of its settlement agreement with Ackerman McQueen as confidential under the protective order in this action.
8. A true and correct copy of an email message from Ramon Hernandez, counsel for the NRA, dated April 11, 2022, to the NYAG and other parties is attached as **Exhibit 13**. The email message states that the NRA's agreement to produce its settlement agreement with Ackerman to the NYAG and others is specifically premised on their agreement not to challenge the confidentiality designation.

Dated: New York, New York
February 14, 2023

By: /s/ Svetlana M. Eisenberg
Svetlana M. Eisenberg