

EXHIBIT “13”

From: [Ramon Hernandez](#)
To: [Connell, Monica](#); [Stern, Emily](#); [Thompson, Stephen](#)
Cc: [Svetlana Eisenberg](#); [Loegering, Becca](#); kent@correlllawgroup.com; [Lisa Correll](#); wfleming@gagespencer.com; sfarber@winston.com; tmclish@akingump.com; ejohnson@gagespencer.com; [Conley, Jonathan](#); mwerbner@werbnerlaw.com; [Philip Furia](#); [Block, Samantha](#); [Booker, Hayley](#)
Subject: People of the State of New York v National Rifle Association of America, et al., Index No. 451625/2020
Date: Monday, April 11, 2022 10:54:50 AM

Counsel:

Without waiving any and reserving all rights, and subject to the objections and reservations of rights set forth in (i) the NRA's responses and objections, and (ii) subsequent correspondence between the parties, please see below a link to the NRA's production of records, Bates stamped NRA-NYAGCOMMDIV-01523038 - NRA-NYAGCOMMDIV-01523060.

This production consists of (1) Confidential Settlement Agreement between the NRA and Ackerman McQueen, et al.; and [2] Confidential Settlement Term Sheet. The NRA is producing these documents to the NYAG based on the representation by Assistant Attorney General William Wang in writing on March 17, 2022 and on a subsequent call, which took place on April 1, 2022, that the NYAG will not challenge the designation of these documents as confidential under the proposed confidentiality order agreed to by all parties, submitted on September 28, 2021 (NYSCEF No. 394).

If/once other parties agree to the same condition, the NRA will provide the password to the production to them as well.

Link: <https://filecloud.brewerattorneys.com/Public/?folder=57905c27>

Regards,

Ramon Hernandez | Associate
Brewer, Attorneys & Counselors
1717 Main Street, Suite 5900
Dallas, Texas 75201
Office: 214.653.4844 | Fax: 214.653.1015
rxh@brewerattorneys.com | www.brewerattorneys.com