

# Exhibit C

**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,**

**Index No. 451625/2020**

**Plaintiff,**

**v.**

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

**Defendants.**

**THE NATIONAL RIFLE ASSOCIATION OF AMERICA'S SECOND SET OF  
INTERROGATORIES TO PLAINTIFF**

Pursuant to New York Civil Practice Law and Rules ("CPLR") Rule 3130.1, Rule 3131, Article 31 of the CPLR, and Rule 11-a of the Commercial Division Rules (N.Y.C.R.R. 202.70(11-a)), the National Rifle Association of America (the "NRA") by and through its undersigned counsel, hereby demands that Plaintiff respond to the following interrogatories, in writing and under oath, within twenty (20) days.

**I.**  
**INSTRUCTIONS**

1. In responding to these Interrogatories, You are required to provide all information in Your possession, custody, or control, including information in the possession, custody, or control of any of Your attorneys, agents, employees, representatives, investigators, associates, and Persons under Your control.

2. If You cannot respond to any of these Interrogatories in full after exercising due

diligence to secure the responsive information to do so, You are required to respond to the extent possible, describing in detail the reason(s) for Your inability to answer the remainder and stating whatever information or knowledge You have concerning the unanswered portions.

3. If You refuse to respond to any Interrogatory based on a claim of privilege, in whole or in part, please state sufficient information for the Court to determine whether the privilege has appropriately been claimed, including:

- a. The nature of each privilege asserted;
- b. The factual bases for asserting each privilege; and
- c. The name of each Person involved in any Interrogatory for which privilege is claimed.

4. If You object to an Interrogatory, You must fully set forth Your objections in writing and, for each objection, state with reasonable particularity the reason for the objection.

5. If You object to an Interrogatory in part, You must answer so much of that Interrogatory as is not objectionable.

6. The specificity of any Interrogatory shall not be construed to limit the generality or reach of any other Interrogatory.

7. If You refer to a Document in response to an Interrogatory, You must produce that Document. To the extent Your answers refer to Documents already produced by You or other parties in this action, identify the relevant Documents by Bates number range.

8. These Interrogatories are deemed continuing and You are therefore required to promptly update, supplement, amend, or withdraw your responses if You obtain supplemental or additional information between the time that the answers are served and trial.

9. For Interrogatories related to witness names, locations, or descriptions of evidence, such witness names, locations, or descriptions of evidence must be provided irrespective of whether

(i) they are purportedly “confidential” as asserted on Your privilege log; or (ii) provided to You from another law enforcement, regulatory, or government source. To the extent that You exclude or withhold responsive information on the grounds of any privilege, You must provide a particularized affidavit and log relating to such materials.

## **II.** **DEFINITIONS**

1. “Action” shall mean the above-captioned action, Index No. 451625/2020, in the Supreme Court of the State of New York, Commercial Division, New York County, including: (i) the claims asserted by the Attorney General of New York State against the NRA and other defendants, and (ii) the amended counterclaims asserted by the NRA against the Attorney General of New York State.

2. “All” and “any” shall be construed so as to bring within the scope of the Interrogatory responses that might otherwise be construed to be outside the scope of the Interrogatory.

3. “Second Amended Verified Complaint” shall mean the Second Amended Verified Complaint filed in the Action on May 2, 2022.

4. “Document(s)” has the broadest meaning permitted by the CPLR and any other applicable laws and rules including, without limitation, any written, recorded, graphic, or other matter, whether sent or received or made or used internally, however produced or reproduced and whatever the medium on which it was produced or reproduced (whether on paper, cards, charts, files, printouts, tapes, discs, belts, video tapes, audiotapes, tape recordings, cassettes, or other types of voice recording or transcription, computer tapes, databases, emails, pictures, photographs, slides, films, microfilms, motion pictures, mobile devices, smart phones, or any other medium), and any other tangible item or thing of readable, recorded, or visual material of whatever nature

including without limitation originals, drafts, electronic documents with included metadata, and all non-identical copies of each Document (which, by reason of any variation, such as the presence or absence of handwritten notes or underlining, represents a separate Document within the meaning of this term). The foregoing specifically includes information stored electronically, whether in a computer database or otherwise, regardless of whether such Documents are also presently in documentary form.

5. “OAG,” “You,” and “Your” shall mean and refer to Plaintiff in this Action and all of its agents, employees, constituent bureaus, and other departments.

6. “Person” and “persons” includes natural persons, groups of natural persons acting in a collegial capacity (*e.g.*, a committee or counsel), firms, corporations, partnerships, associations, joint ventures, trusts, and any other incorporated or unincorporated business, governmental, public, or legal entity.

7. “Relating to,” or “concerning” shall mean relating to, concerning, reflecting, referring to, having a relationship to, pertaining to, identifying, containing, pertinent to, comprising, setting forth, showing, disclosing, describing, explaining, summarizing, evidencing, or constituting, directly or indirectly, in whole or in part, or to be otherwise factually, legally, or logically connected to, the subject matter of the particular Interrogatory.

8. Whenever appropriate, the singular form of a word shall be interpreted in the plural, and vice-versa, and the words “and” and “or” shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of the Interrogatory all responses that might otherwise be construed to be outside of its scope.

9. The term “material and necessary” has the same meaning as ascribed to it by authors of Rule 11-a of the Rules of the Commercial Division and courts interpreting it.

**III.**  
**INTERROGATORIES**

**INTERROGATORY NO. 9:**

As to the First Cause of Action of the Second Amended Verified Complaint, name witnesses with knowledge of information material and necessary to the subject matter of the First Cause of Action.

**RESPONSE:**

**INTERROGATORY NO. 10:**

As to the First Cause of Action of the Second Amended Verified Complaint, specify Your computation of damages sought, if any, including the methodology of Your computation of any damages, whether You are pursuing any other party on account of the same alleged loss or amount, and specify what payments, other transactions, or events are included in Your request(s) for damages.

**RESPONSE:**

**INTERROGATORY NO. 11:**

For all Documents and any pieces of physical evidence that are material and necessary to prove or disprove the First Cause of Action, identify such Documents and physical evidence by custodian, location, and general description.

**RESPONSE**

**INTERROGATORY NO. 12:**

As to the Thirteenth Cause of Action of the Second Amended Verified Complaint, name witnesses with knowledge of information material and necessary to the subject matter of the Thirteenth Cause of Action.

**RESPONSE****INTERROGATORY NO. 13:**

As to the Thirteenth Cause of Action of the Second Amended Verified Complaint, specify Your computation of damages sought, if any, including the methodology of Your computation of any damages, whether You are pursuing any other party on account of the same alleged loss or amount, and specify what payments, other transactions, or events are included in Your request(s) for damages.

**RESPONSE****INTERROGATORY NO. 14:**

For all Documents and any pieces of physical evidence that are material and necessary to prove or disprove the Thirteenth Cause of Action, identify such Documents by custodian, location, and general description.

**RESPONSE**

**INTERROGATORY NO. 15:**

As to the Fourteenth Cause of Action of the Second Amended Verified Complaint, name witnesses with knowledge of information material and necessary to the subject matter of the Fourteenth Cause of Action.

**RESPONSE****INTERROGATORY NO. 16:**

As to the Fourteenth Cause of Action of the Second Amended Verified Complaint, specify Your computation of damages sought, if any, including the methodology of Your computation of any damages, whether You are pursuing any other party on account of the same alleged loss or amount, and specify what payments, other transactions, or events are included in Your request(s) for damages.

**RESPONSE****INTERROGATORY NO. 17:**

For all Documents and any pieces of physical evidence that are material and necessary to prove or disprove the Fourteenth Cause of Action, identify such Documents by custodian, location, and general description.

**RESPONSE**



**INTERROGATORY NO. 18:**

As to the Fifteenth Cause of Action of the Second Amended Verified Complaint, name witnesses with knowledge of information material and necessary to the subject matter of the Fifteenth Cause of Action.

**RESPONSE****INTERROGATORY NO. 19:**

As to the Fifteenth Cause of Action of the Second Amended Verified Complaint, specify Your computation of damages sought, if any, including the methodology of Your computation of any damages, whether You are pursuing any other party on account of the same alleged loss or amount, and specify what payments, other transactions, or events are included in Your request(s) for damages.

**RESPONSE****INTERROGATORY NO. 20:**

For all Documents and any pieces of physical evidence that are material and necessary to prove or disprove the Fifteenth Cause of Action, identify such Documents by custodian, location, and general description.

**RESPONSE**

**INTERROGATORY NO. 21:**

As to Paragraph K of the “Prayer for Relief” section of the Second Amended Verified Complaint, to the extent it refers to remedies or relief that the OAG seeks against the NRA other than those listed in the First, Thirteenth, Fourteenth, or Fifteenth Causes of Action of the Second Amended Verified Complaint, name (i) witnesses with knowledge of information material and necessary (within the meaning of Rule 11-a of the Rules of the Commercial Division) to the subject matter of the remedies or relief, specify the computation of any category of damages sought, and for all Documents and any pieces of physical evidence that are material and necessary to proving or refuting the predicates for the requested remedies/relief, identify such Documents and physical evidence by custodian, location, and general description.

**RESPONSE**

Dated: New York, New York

June 9, 2022

By: /s/ Blaine E. Adams

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