

Exhibit H

B R E W E R
ATTORNEYS & COUNSELORS

December 8, 2022

VIA EMAIL

Monica Connell
Assistant Attorney General
Charities Bureau
28 Liberty Street
New York, NY 10005
Monica.Connell@ag.ny.gov

Re: ***NYAG v. The National Rifle Association of America et al.***,
Index No. 451625/2020

Dear Ms. Connell:

On behalf of the National Rifle Association of America (the “NRA”), I write to inform the NYAG that the NYAG's responses to the NRA's interrogatories, dated November 22, 2022 (attached), fail to comply with the NYAG's discovery obligations under the applicable rules. We would like to schedule a meet and confer about this important matter for Friday, December 9, 2022.

In this action, the NYAG seeks a host of invasive and costly remedies against the NRA, yet, for years has failed to identify specific information about her claims. Indeed, the Second Amended Verified Complaint expressly states that, although it provides examples of specific transactions and occurrences, the examples of alleged wrongdoing provided by the NYAG are not exhaustive.

Indeed, for that reason (among others), the NRA sought to take the deposition of the NYAG's corporate representative and the head of the NYAG's Charities Bureau James Sheehan. As you know, the NYAG opposed those requests. In refusing to compel the NYAG to appear for these depositions, the Special Master specifically ruled that the NRA's questions would appropriately be addressed through responses to interrogatories. Unfortunately, in answering the NRA's interrogatories, the NYAG repeatedly refers the NRA to the vast discovery record in this case and to her complaint. Similarly, the NYAG continues to assert that the examples that the NYAG provides are merely illustrative.

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Regards,

/s/ Svetlana M. Eisenberg

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cc: Parties' Counsel of Record