

Exhibit J

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ATTORNEYS & COUNSELORS

January 20, 2023

VIA EMAIL

Sharon Sash, Esq.
Assistant Attorney General
New York State Office of the Attorney General
28 Liberty Street
New York, New York 10005

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

Dear Ms. Sash,

On behalf of the National Rifle Association of America (the “NRA”), we write again about our concern regarding the significant deficiencies in the NYAG’s responses to the NRA’s contention interrogatories. This letter expressly incorporates by reference the NRA’s prior correspondence to the NYAG concerning the deficiencies, including the letter dated December 8, 2022, and the email message dated December 14, 2022.

Although the additional information provided by the NYAG on January 9, 2023, pertaining to her responses to the NRA’s contention interrogatories 1, 2, and 8 is helpful, it is not what the NYAG stated she would provide on December 17, 2022, does not discharge the NYAG’s obligations under the applicable rules with regard to the three interrogatories or otherwise, and, in some instances, raises additional questions.

Please confirm by 9 am E.S.T. on Tuesday, January 24, 2023, that you will not provide any additional information in response to the NRA’s contention interrogatories. Of course, the NRA is willing to meet and confer on these issues further.

The NRA notes that the NYAG’s failure to specify information she intends to put at issue at trial is particularly prejudicial because, at prior stages of the action, contention interrogatories were referred to by the Special Master for Discovery as the mechanism through which the NRA should be entitled to obtain information it has long sought. For example, to obtain such information (among other reasons), the NRA sought to take the deposition of the NYAG’s corporate representative and the head of the NYAG’s Charities Bureau James Sheehan. The NYAG opposed those requests, and, in refusing to compel the NYAG to appear for these depositions, the Special Master specifically ruled that the NRA’s questions would appropriately

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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. Such gamesmanship must stop.

Should the NYAG be interested in an additional meet and confer meeting with the NRA, the NRA is available at your convenience. Please let us know if the NYAG believes that the parties should make further attempts at resolving these disputes before the NRA seeks judicial relief.

Sincerely,

/s/ Svetlana M. Eisenberg

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