

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK – COMMERCIAL DIVISION

PEOPLE OF THE STATE OF NEW YORK,	§	
BY LETITIA JAMES, ATTORNEY GENERAL	§	Index No. 451625/2020
OF THE STATE OF NEW YORK,	§	Hon. Joel M. Cohen
	§	
Plaintiff,	§	Motion Sequence No. _____
	§	
v.	§	
	§	
THE NATIONAL RIFLE ASSOCIATION OF	§	<u>NOTICE OF MOTION</u>
AMERICA, WAYNE LAPIERRE, WILSON	§	
PHILLIPS, JOHN FRAZER, and JOSHUA	§	Oral Argument Requested
POWELL,	§	
	§	
Defendants.	§	

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the Memorandum Of Law In Support Of Defendant The National Rifle Association Of America’s Motion To Preclude Evidence Pursuant To CPLR 3126, the Affirmation In Support Of Defendant The National Rifle Association Of America’s Motion To Preclude Evidence Pursuant To CPLR 3126, and the exhibits annexed thereto, Defendant the National Rifle Association of America (“NRA”), by and through undersigned counsel, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, New York 10007 at 9:30 a.m. on March 30, 2023, or at such other time as the Court may direct, for an order, pursuant to CPLR 3126, precluding Plaintiff Attorney General of the State of New York (“NYAG”) from offering evidence related to information sought in NRA Contention Interrogatories 1, 2, and 8 to which the NYAG has refused to provide complete responses, or, alternatively, pursuant to CPLR 3124, compelling the NYAG to provide complete responses to

NRA Contention Interrogatories 1, 2, and 8, and granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any opposition to the motion is due at least seven (7) days before the return date stated herein, or at such other time as set by the Court or agreed upon by the parties.

Respectfully submitted,

Dated: March 14, 2023
New York, New York

/s/ Christopher T. Zona

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**COUNSEL FOR DEFENDANT
THE NATIONAL RIFLE
ASSOCIATION OF AMERICA**

CERTIFICATE OF SERVICE

I, Christopher T. Zona, hereby certify that, on March 14, 2023, a true and correct copy of the foregoing document was electronically transmitted and served upon all counsel of record via this Court's electronic case filing system.

Dated: March 14, 2023
New York, New York

/s/ Christopher T. Zona
Christopher T. Zona