

**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,**

Plaintiff,

v.

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

Defendants.

Index No. 451625/2020

**AFFIRMATION IN
SUPPORT OF PLAINTIFF
THE PEOPLE OF THE
STATE OF NEW YORK'S
REQUEST FOR AN
ADJOURNMENT**

Sharon Sash, an attorney duly admitted to practice before the Courts of this State, hereby affirms the following under the penalty of perjury pursuant to CPLR § 2106:

1. I am an Assistant Attorney General in the Enforcement Section of the Charities Bureau of the Office of the New York State Attorney General ("OAG" or "Attorney General"), counsel for Plaintiff, People of the State of New York ("Plaintiff").
2. I submit this affirmation in support of Plaintiff's application for an adjournment of the return dates on Defendant Wayne LaPierre's motion to seal (Motion Sequence No. 59, NYSCEF 1764) and Defendant National Rifle Association of America's motion to seal (Motion Sequence No. 60, NYSCEF 1769).
3. Movants have consented to an adjournment and briefing schedule on both motions per the stipulation attached hereto (filed at NYSCEF 1798 and 1799). Plaintiff asks that, pending such other or further schedule as may be imposed by the Hon. Joel M. Cohen, the Judge assigned

to this case, Motion Sequence Nos. 59 and 60 be adjourned for all purposes until June 6, 2023, at 9:30 a.m.

4. This is Plaintiff's first request for an adjournment of these return dates.

WHEREFORE, in light of the foregoing, Plaintiff respectfully requests that Motion Sequence No. 59 (NYSCEF 1764), currently returnable at the Motion Support Office of the New York County Courthouse located at 60 Centre Street, New York, New York, Room 130 on April 17, 2023, at 9:30 a.m., be adjourned for all purposes until June 6, 2023, at 9:30 a.m.

WHEREFORE, in light of the foregoing, Plaintiff respectfully requests that Motion Sequence No. 60 (NYSCEF 1769), currently returnable at the Motion Support Office of the New York County Courthouse located at 60 Centre Street, New York, New York, Room 130 on April 21, 2023, at 9:30 a.m., be adjourned for all purposes until June 6, 2023, at 9:30 a.m.

Dated: New York, New York
April 13, 2023

Respectfully submitted,

BY: 

Sharon Sash

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Attorney for Plaintiff

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,

Plaintiff,

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

Defendants.

Index No. 451625/2020
(Cohen, J.)

**STIPULATION AND
PROPOSED ORDER
SETTING BRIEFING SCHEDULE
ON MOTIONS TO SEAL
SEQ. NOS. 59 AND 60**

WHEREAS, Defendants Wayne LaPierre and National Rifle Association of America
filed motions to seal at Motion Sequences 59 and 60, respectively;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
counsel for the respective parties that opposition to pending motions 59 and 60 to seal shall be
filed on May 12, 2023, and replies shall be filed on June 5, 2023, upon the Court's endorsement:

IT IS FURTHER STIPULATED AND AGREED that this Stipulation can be executed
in counterparts and/or by using electronic, scanned or telefaxed signatures, with the same effect
as original signatures.

IN WITNESS WHEREOF, this Stipulation is executed by counsel for the parties on the
pending motions on April 7, 2023.

For Plaintiff

ATTORNEY GENERAL
OF THE STATE OF NEW YORK

/s Sharon Sash

By: _____

Sharon Sash
28 Liberty Street
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Tel. (212) 416-8401

For Defendant The National Rifle
Association of America

BREWER, ATTORNEYS AND
COUNSELORS

/s Svetlana Eisenberg

By: _____

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Tel. (212) 527-2587

For Defendant Wayne LaPierre

CORRELL LAW GROUP

By: */s P. Kent Correll* _____

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SO ORDERED:

Hon. Joel M. Cohen, J.S.C.