

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

Hon. Joel M. Cohen

**AFFIDAVIT OF
REBECCA LOEGERING
IN SUPPORT OF
DEFENDANT WILSON H.
PHILLIPS'S MOTION TO
EXCLUDE TESTIMONY OF
ERIC HINES**

AFFIDAVIT OF REBECCA LOEGERING

STATE OF TEXAS §

COUNTY OF DALLAS §

I, **Rebecca Loegering**, being duly sworn, hereby depose and state:

1. My name is Rebecca Loegering. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am an attorney at the law firm of Winston & Strawn LLP, attorneys for Defendant Wilson H. Phillips ("Phillips") in the above-captioned matter. As such, I have personal knowledge of the facts set forth herein.

3. I submit this Affidavit in support of Phillips's Motion to Exclude Expert Testimony of Eric Hines.

4. On September 16, 2022, the NYAG served Phillips with an Expert Disclosure related to Eric Hines indicating the NYAG's intention to call Hines as an expert witness as part of the NYAG's case-in-chief.

5. Attached hereto as Exhibit A is a true and correct copy of the NYAG's "Expert Disclosure" related to Eric A. Hines, dated September 16, 2022. The Expert Disclosure contains the "Expert Report Of Eric Hines, CPA, CFF, CHC," dated September 16, 2022, which is marked as Exhibit A to the Expert Disclosure. References to the "Hines Report" in the motion and attendant memorandum of law refer to the "Expert Report of Eric Hines, CPA, CFF, CHC" dated September 16, 2022.


Rebecca Loegering

Dated: March 24, 2023
Dallas, Texas

Respectfully Submitted,

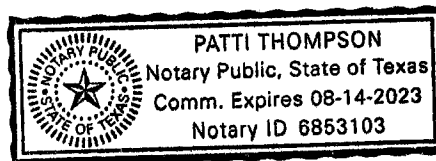
By: /s/ Rebecca Loegering
Rebecca Loegering (admitted *pro hac vice*)
WINSTON & STRAWN LLP
2121 North Pearl St., Suite 900
Dallas, Texas 75201
Tel: (214) 453-6500
rloegering@winston.com

Counsel for Defendant Wilson Phillips

On the 24th day of March in the year 2023, before me the undersigned, personally appeared REBECCA LOEGERING, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within document and he acknowledged to me that he executed the same in his capacity, and that by his signature on the document, the individual or the person upon behalf of which the individual acted, executed the document.

WITNESS my hand and official seal.

Patti Thompson



Notary Public in and for the State of Texas

CERTIFICATE OF COMPLIANCE

1. The following statement is made in accordance with N.Y.C.R.R. § 202.8-b and Commercial Division Rule 17.
2. The foregoing Affidavit In Support of Defendant Wilson H. Phillips's Motion to Exclude Expert Testimony of Eric Hines was prepared in the processing system Microsoft Word, with Times New Roman typeface, 12-point font.
3. Relying on the word count of the word-processing system, the total number of words in this document, exclusive of the caption and signature block, is 231 words.

Dated: March 24, 2023
Dallas, Texas

By: /s/ Rebecca Loegering
Rebecca Loegering

CERTIFICATE OF CONFORMITY

The undersigned does hereby certify that she is an attorney at law duly admitted to practice in the State of Texas and is a resident of the State of Texas, that she is a person duly qualified to make this certificate of conformity pursuant to Section 299-a of the Real Property Law of the State of New York: that she is fully acquainted with the laws of the State of Texas pertaining to the acknowledgment or proof of deeds of real property to be recorded therein; that the foregoing affidavit filed as the Affidavit of Rebecca Loegering in Support of Defendant Wilson H. Phillips's Motion to Exclude Expert Testimony of Eric Hines in the matter with the Index Number 451625/2020, dated March 24, 2023 taken before Patti A. Thompson, a notary in State of Texas, Dallas County, was taken in the manner prescribed by such laws of the State of Texas, Dallas County, being the State in which it was taken; and that it duly conforms with such laws and is in all respects valid and effective in such State.

Dated: March 24, 2023
Dallas, Texas



Rebecca Loegering
Attorney at law in State of Texas