

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
Motion Seq. No. 58

**AFFIRMATION IN OPPOSITION
TO THE NRA'S MOTION FOR A SEALING ORDER**

Stephen C. Thompson, an attorney duly admitted to the Bar of this State, affirms
under penalties of perjury pursuant to Civil Practice Law and Rules 2016 as follows:

1. I am an Assistant Attorney General in the Office of Letitia James, Attorney General
of the State of New York ("OAG"), who appears on behalf of the People of the State of New York
in this action.

2. I submit this Affirmation in support of Plaintiff's opposition to the National Rifle
Association of America's ("NRA") motion for a sealing order, Motion Sequence No. 58.

3. I am familiar with the facts and circumstances set forth in this Affirmation, which
are based upon my personal knowledge and information contained in the files of the OAG.

4. Attached as Exhibit A to this affirmation is a true and correct copy of Docket No.
421 from *National Rifle Association of America v. Ackerman McQueen Inc. et al.*, No. 19-cv-
02074 (N.D. Tex.).

5. Attached as Exhibit B to this affirmation is a true and correct copy of an excerpt of Docket No. 761 from *In re National Rifle Association of America and Sea Girt LLC*, Jointly Administered, No. 21-30085-hdh11 (Bankr. S.D. Tex.).

Dated: April 4, 2023
New York, New York

/s/ Stephen Thompson
Stephen C. Thompson

Attorney Certification Pursuant to Commercial Division Rule 17

I, Stephen Thompson, an attorney duly admitted to practice law before the courts of the State of New York, certify that the Affirmation of Stephen Thompson in Opposition to the NRA's Motion for a Sealing Order complies with the word count limit set forth in Rule 17 of the Commercial Division of the Supreme Court (22 NYCRR 202.70(g)) because the affirmation contains 197 words, excluding the parts exempted by Rule 17. In preparing this certification, I have relied on the word count of the word-processing system used to prepare this affirmation.

Dated: April 4, 2023
New York, New York

/s/ Stephen Thompson
Stephen C. Thompson