

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK,

Plaintiff,

-against-

Index No. 451625/2020

**AFFIRMATION IN
SUPPORT OF THE NRA'S
MOTION FOR A SEALING
ORDER**

Motion Sequence No. ____

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

Defendants.

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I, Svetlana M. Eisenberg, an attorney duly admitted to practice law before the Courts of the State of New York, affirm under penalty of perjury pursuant to CPLR § 2106 as follows:

1. I am a Partner at Brewer, Attorneys & Counselors, counsel for the National Rifle Association of America (the “NRA”).

2. I submit this affirmation in support of the NRA's motion for a sealing order dated March 27, 2023.

3. On March 20, 2023, in opposing the relief sought by Josh Powell in motion Sequence No. 46, the Office of the New York Attorney General (the “NYAG”) and the NRA filed in fully redacted form several Confidential documents (the “Documents”) produced by the NRA.

4. The Documents are:

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Agreement, whether in writing or electronically with the reasonable expectation that such information is ‘confidential.’”

7. Exhibit BA (NYSCEF 1576) to the affirmation of Alexander Mendelson (NYSCEF 1522) (**Exhibit 2** hereto) details travel information of individuals other than Joshua Powell, including numerous individuals who have not worked at the NRA. In addition, the extensive spreadsheet contains multiple sheets and a great amount of information, including the forensic accounting firm’s inferences and speculation about the individuals referenced therein, including numerous individuals who are not party to this action.

8. The credit card statements referenced above (Exhibits 4 through 39) detail travel, whereabouts, and purchases pertaining to individuals other than Joshua Powell, including individuals not party to this action.

Dated: March 27, 2023
New York, New York

/s/ Svetlana M. Eisenberg
Svetlana M. Eisenberg