

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

IAS Part Three
Hon. Joel M. Cohen

**AFFIRMATION OF
P. KENT CORRELL, ESQ.**

I, P. KENT CORRELL, an attorney duly admitted to practice in the courts of the State of New York, hereby affirm the following under the penalty of perjury pursuant to CPLR 2106:

1. I am the attorney of record for Defendant Wayne LaPierre in this action, and am fully familiar with the facts and circumstances in this case.

2. I submit this affirmation in support of Mr. LaPierre's motion for a sealing order dated March 31, 2023.

3. On March 24, 2023, in support of its Motion to Exclude Defendants' Compensation and Security Expert Opinions (NYSCEF 1663-1679 and 1712-1713), Plaintiff People of the State of New York, by Letitia James, Attorney General of the State of New York ("Plaintiff") filed, under seal, certain exhibits (the "Documents").

4. The Documents are:

a. an excerpt of the deposition transcript of Defendant Wayne LaPierre, dated June 27, 2022, that contains the names of Mr. LaPierre's wife's niece's family members

and his own family members, including children, none of whom is a party to this action (NYSCEF 1671) (attached hereto as **Exhibit 1** and filed under seal); and

b. an excerpt of the deposition transcript of Gayle Stanford, dated February 28, 2022, that contains the names of family members of Defendant Wayne LaPierre's wife's niece, including a minor child, none of whom is a party to this action (NYSCEF 1670) (attached hereto as **Exhibit 2** and filed under seal).

5. During Mr. LaPierre's deposition, counsel for Plaintiff asked Mr. LaPierre a series of questions that called for him to confirm the names of his wife's niece's family members and certain of his own family members. *See Exhibit 1* (LaPierre Transcript at 231:4-232:5).

6. I specifically requested that this portion of the transcript be designated as "confidential" and counsel for Plaintiff replied: "That's fine." *See Exhibit 1* (LaPierre Transcript at 232:10-13).

7. During Ms. Stanford's deposition, counsel for Plaintiff asked Mr. LaPierre a series of questions that called for him to confirm the names of his wife's niece's family members, including the name of a minor child. *See Exhibit 2* (Stanford Transcript at 31:9-25).

8. Upon information and belief, as evidenced by security studies conducted by security professionals, Mr. LaPierre is subject to a very high level of security risk. *See* NYSCEF 1676 ("Exhibit L to Wang Aff. under seal" [Deposition Transcript of J. Lawrence Cunningham]) at 66:11-24).

Executed this 31st day of March 2023 in New York, New York.

/s/ P. Kent Correll

P. Kent Correll

CERTIFICATE OF COMPLIANCE

I, P. Kent Correll, an attorney duly admitted to practice law before the courts of the State of New York, certify that the Affirmation of P. Kent Correll, Esq. 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 393 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: New York, New York
March 31, 2023

/s/ P. Kent Correll

P. Kent Correll

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 31st day of March 2023.

/s/ P. Kent Correll
P. Kent Correll