FILED: NEW YORK COUNTY CLERK 03/20/2023 11:41 PM

NYSCEF DOC. NO. 1589

INDEX NO. 451625/2020

RECEIVED NYSCEF: 03/20/2023

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 ET AL.,

Defendants.

INDEX NO. 451625/2020

Hon. Joel M. Cohen

Motion Sequence No. 44

<u>AFFIRMATION OF SARAH ROGERS IN SUPPORT OF THE NRA'S PARTIAL</u> <u>OPPOSITION TO JOSHUA POWELL'S MOTION FOR SUMMARY JUDGMENT</u>

- I, Sarah Rogers, an attorney duly admitted to practice law before the Courts of New York, affirm under penalty of perjury as follows:
 - 1. I am a Partner at Brewer, Attorneys & Counselors, counsel for the National Rifle Association of America (the "NRA").
 - 2. I respectfully submit this affirmation in support of the NRA's Partial Opposition to Joshua Powell's Motion for Summary Judgment
 - 3. Attached hereto as Exhibit 1 is the March 20, 2023 Affidavit of John Frazer with related exhibits.
 - 4. Attached hereto as Exhibit 2 is the March 13, 2023 Affidavit of Sonya Rowling with related exhibits.
 - 5. Attached hereto as Exhibit 3 is the March 10, 2023 Affidavit of Wayne LaPierre.
 - 6. Attached hereto as Exhibit 4 is the March 20, 2023 Affidavit of David Coy.

INDEX NO. 451625/2020

COUNTY CLERK 03/20/2023 11:41

NYSCEF DOC. NO. 1589 RECEIVED NYSCEF: 03/20/2023

> 7. Attached hereto as Exhibit 5 is a true and correct copy of the Email from S.

> McCormick to Joshua Powell dated June 12, 2017, enclosing Conflict of Interest and Related

Party Transactions policies, designated by Bates Nos. NRA-NYAGCOMMDIV-01142266-

2276.

8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition

of Lisa Supernaugh, dated May 5, 2022.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the deposition

of Craig Spray, dated January 14, 2022.

10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the Bankruptcy

trial testimony of Sonya Rowling, dated April 8, 2021.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Email Chain titled

"re:Email Address?" designated by Bates No. MCKENNA 00009848.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the deposition

of Joshua Powell, dated June 9, 2022.

13. Attached hereto as Exhibit 11 is a true and correct copy of the Email Chain titled

"re: Invoice for photo shoot at the Carry Guard Convention," designated by Bates No. NRA-

NYAG-00012605.

14. Attached hereto as Exhibit 12 is a true and correct copy of the CPLR 3101(d)

Disclosure of Defendant Wayne LaPierre, dated September 16, 2022.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the minutes

from the September 6, 2018 Audit Committee meeting.

Dated: March 20, 2023

New York, NY

2

2 of 4

FILED: NEW YORK COUNTY CLERK 03/20/2023 11:41 PM

NYSCEF DOC. NO. 1589

INDEX NO. 451625/2020

RECEIVED NYSCEF: 03/20/2023

By: <u>s/ Sarah Rogers</u> Sarah Rogers

FILED: NEW YORK COUNTY CLERK 03/20/2023 11:41 PM

NYSCEF DOC. NO. 1589

INDEX NO. 451625/2020

RECEIVED NYSCEF: 03/20/2023

Certification of Compliance

I, Sarah B. Rogers, an attorney duly admitted to practice law before the courts of the State

of New York, certify that the foregoing Affirmation filed on behalf of the NRA complies with the

word count limit set in 22 CRR-NY 202.8b (a)(1). The affirmation contains fewer than 7,000

words. In executing this certification, I relied on the word count function of MS Word.

Dated: March 20, 2023

New York, New York

By: s/ Sarah Rogers

Sarah Rogers

4