FILED: NEW YORK COUNTY CLERK 04/13/2023 12:01 AM INDEX NO. 451625/2020

NYSCEF DOC. NO. 1813

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# **EXHIBIT "F"**

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INDEX NO. 451625/2020

From: Farber, Seth

To: Ramon Hernandez; Connell, Monica; Stern, Emily; Thompson, Stephen

Cc: Svetlana Eisenberg; Loegering, Becca; kent@correlllawgroup.com; Lisa Correll; wfleming@gagespencer.com;

tmclish@akingump.com; ejohnson@gagespencer.com; Conley, Jonathan; mwerbner@werbnerlaw.com; Philip

Furia; Block, Samantha; Booker, Hayley

Subject: RE: People of the State of New York v National Rifle Association of America, et al., Index No. 451625/2020

**Date:** Monday, April 11, 2022 10:00:37 AM

Agreed on behalf of Phillips. Please forward the password.

## Seth C. Farber

### Partner

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**From:** Ramon Hernandez <rxh@brewerattorneys.com>

**Sent:** Monday, April 11, 2022 10:55 AM

**To:** Connell, Monica <Monica.Connell@ag.ny.gov>; Stern, Emily <Emily.Stern@ag.ny.gov>; Thompson, Stephen <Stephen.Thompson@ag.ny.gov>

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**Subject:** People of the State of New York v National Rifle Association of America, et al., Index No. 451625/2020

### Counsel:

Without waiving any and reserving all rights, and subject to the objections and reservations of rights set forth in (i) the NRA's responses and objections, and (ii) subsequent correspondence between the parties, please see below a link to the NRA's production of records, Bates stamped NRA-NYAGCOMMDIV-01523038 - NRA-NYAGCOMMDIV-01523060.

This production consists of (1) Confidential Settlement Agreement between the NRA and Ackerman McQueen, et al.; and [2] Confidential Settlement Term Sheet. The NRA is producing these documents to the NYAG based on the representation by Assistant Attorney General William Wang in writing on March 17, 2022 and on a subsequent call, which took place on April 1, 2022, that the NYAG will not challenge the designation of these documents as

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confidential under the proposed confidentiality order agreed to by all parties, submitted on September 28, 2021 (NYSCEF No. 394).

If/once other parties agree to the same condition, the NRA will provide the password to the production to them as well.

Link: <a href="https://filecloud.brewerattorneys.com/Public/?folder=57905c27">https://filecloud.brewerattorneys.com/Public/?folder=57905c27</a>

Regards,

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