NYSCEF DOC. NO. 1808

INDEX NO. 451625/2020 RECEIVED NYSCEF: 04/13/2023

# EXHIBIT "A"

NYSCEF DOC. NO. 1808

From: Premier VIP premiervip@lexitaslegal.com

Sent: Friday, December 16, 2022 7:27 PM

To: Randee Rogers <<u>rru@brewerattorneys.com</u>>; Becca Loegering <<u>RLoegering@winston.com</u>>; Brooke Burschlag <<u>blb@brewerattorneys.com</u>>; D Sloan <<u>dsloan@winston.com</u>>; David Umansky <<u>diu@BrewerAttorneys.com</u>>; David Vu <<u>dsv@BrewerAttorneys.com</u>>; Hayley Booker <<u>hevans@akingump.com</u>>; Janie Mahan <<u>jmahan@akingump.com</u>>; Jonathan Conley <<u>Jonathan.Conley@ag.ny.gov</u>>; Kent Correll <<u>kent@correlllawgroup.com</u>>; M MacDougall <<u>mmacdougall@akingump.com</u>>; Mark Werbner <<u>mwerbner@werbnerlaw.com</u>>; Monica Connell <<u>Monica.Connell@ag.ny.gov</u>>; Nyna Sargent <<u>nina.sargent@ag.ny.gov</u>>; Patrick Bannon <<u>PBannon@winston.com</u>>; Processing Center <<u>DPC@brewerattorneys.com</u>>; Samantha Block <<u>samantha.block@akingump.com</u>>; Seth Farber <<u>sfarber@winston.com</u>>; Stephen Thompson <<u>Stephen.Thompson@ag.ny.gov</u>>; Svetlana Eisenberg <<u>sme@brewerattorneys.com</u>>; Tom McLish <<u>tmclish@akingump.com</u>>; Will Fleming <<u>wfleming@gagespencer.com</u>>; <u>stenojoan@gmail.com</u> **Cc:** Premier VIP <<u>premiervip@lexitaslegal.com</u>>; Brennan Tucker <<u>brennan.tucker@lexitaslegal.com</u>>; Premier Transcripts <<u>premiertranscripts@lexitaslegal.com</u>>

**Subject:** ATTN TRANSCRIPTS - RE: NYAG v. NRA et al: Hines Deposition - Confidentiality Designations Pursuant to Protective Order

Hello Randee:

Thank you for reaching out to us. We have cc'd herein our Production team to ensure the transcripts are designated as confidential. Please let us know if there is anything further we can assist you with. We hope you have a wonderful weekend.

Premier Transcripts - Job No. 872726; Please see below regarding confidentiality designation. Thank you!

Best regards, Sandra Gonzalez Client Services Specialist

Court Reporting: 888-267-1200 Main: 800-676-2401 www.lexitaslegal.com/premier





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From: Randee Rogers <<u>rru@brewerattorneys.com</u>>
Sent: Friday, December 16, 2022 7:14 PM
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**Subject:** [EXTERNAL] RE: NYAG v. NRA et al: Hines Deposition - Confidentiality Designations Pursuant to Protective Order

Dear Counsel and Ms. Ferrara,

The NRA reviewed the day 2 transcript of Eric Hines's deposition, conducted on November 29, 2022, for any confidentiality designations pursuant to the Protective Order.

Portions of the testimony are dependent on, relate to, or are based on Exhibits 1 and 2 of Mr. Hines's deposition, which are Mr. Hines's report and rebuttal report.

Those reports, in turn, refer to information produced to the NYAG subject to the protections of the Protective Order.

As a result, the NRA designates any testimony based on the reports as confidential under the protective order. Naturally, the reports should be treated confidential pursuant to the protective order as well.

Regards,

Randee

**Randee Rogers** | Director of Litigation Support Direct: 214.653.4812 Cell: 817.919.8704

# BREWER

ATTORNEYS & COUNSELORS

#### From: Randee Rogers

Sent: Friday, November 18, 2022 6:10 PM

To: nyrtreporter@gmail.com; Becca Loegering <<u>RLoegering@winston.com</u>>; Brooke Burschlag <<u>blb@brewerattorneys.com</u>>; D Sloan <<u>dsloan@winston.com</u>>; David Umansky <<u>diu@BrewerAttorneys.com</u>>; David Vu <<u>dsv@BrewerAttorneys.com</u>>; Hayley Booker <<u>hevans@akingump.com</u>>; Janie Mahan <<u>imahan@akingump.com</u>>; Jonathan Conley <<u>Jonathan.Conley@ag.ny.gov</u>>; Kent Correll <<u>kent@correlllawgroup.com</u>>; M MacDougall <<u>mmacdougall@akingump.com</u>>; Mark Werbner <<u>mwerbner@werbnerlaw.com</u>>; Monica Connell <<u>Monica.Connell@ag.ny.gov</u>>; Nyna Sargent <<u>nina.sargent@ag.ny.gov</u>>; Patrick Bannon <<u>PBannon@winston.com</u>>; Processing Center <<u>DPC@brewerattorneys.com</u>>; Randee Rogers

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Subject: NYAG v. NRA et al: Hines Deposition - Confidentiality Designations Pursuant to Protective Order

Counsel and Ms. Bidonde,

The NRA reviewed the transcript of Eric Hines's deposition for any confidentiality designations pursuant to the Protective Order.

Portions of the testimony are dependent on, relate to, or are based on Exhibits 1 and 2, which are Mr. Hines's report and rebuttal report.

Those reports, in turn, refer to information produced to the NYAG subject to the protections of the Protective Order.

As a result, the NRA designates any testimony based on the reports as confidential under the protective order. Naturally, the reports should be treated confidential pursuant to the protective order as well.

Regards,

Randee

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### BREWER

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Subject: RE: People of The State Of New York v. The NRA - Deposition Transcripts

Tenenbaum: https://filecloud.brewerattorneys.com/Public/?folder=76c4c198

Hines: https://filecloud.brewerattorneys.com/Public/?folder=540b11bf

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#### From: Randee Rogers

#### Sent: Tuesday, November 8, 2022 12:23 PM

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Subject: People of The State Of New York v. The NRA - Deposition Transcripts

Counsel,

Shortly, I will be sending links to the transcripts and exhibits for the depositions of Eric Hines, taken by the NRA on November 3, 2022, and Jeffrey Tenenbaum, taken by the NRA on November 1, 2022.

The password for the Tenenbaum link is:

The password for the Hines link is:

Thank you.

Randee

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