FILED: NEW YORK COUNTY CLERK 03/27/2023 11:46 PM

NYSCEF DOC. NO. 1716

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

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

ntiff

Plaintiff,

v.

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

Defendants.

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NOTICE OF MOTION

Sequence No. ____

PLEASE TAKE NOTICE that upon (i) the attached affirmation of Svetlana M. Eisenberg dated March 27, 2023, (ii) the exhibits attached thereto, (iii) the accompanying memorandum of law in support of this motion, dated March 27, 2023, and (iv) upon all the pleadings and proceedings in this action to date, the National Rifle Association of America, by undersigned counsel, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, New York 10007, at 9:30 a.m. on April 12, 2023, or as soon thereafter as counsel may be heard, for an order permitting under 22 N.Y.C.R.R. § 216.1 the filing under seal of the Documents as that term is defined in the accompanying memorandum of law as well as the filing in redacted form of the relevant memoranda of law, affidavits, and affirmations as specified in accompanying the memorandum of law to the extent they refer to the Documents.

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Court.

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PLEASE TAKE FURTHER NOTICE that, subject to any order of the Court, any opposition to the motion is due on, or before, April 5, 2023, or at such other time as set by the

Dated: March 27, 2023

Respectfully Submitted,

By: /s/ Svetlana M. Eisenberg

Svetlana M. Eisenberg sme@brewerattorneys.com

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COUNSEL FOR THE NATIONAL RIFLE ASSOCIATION OF AMERICA