

**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,**

**Plaintiff,**

**v.**

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

**Defendants.**

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**INDEX NO. 451625/2020**

**NOTICE OF MOTION**

**Sequence No. \_\_\_\_**

PLEASE TAKE NOTICE that, upon the attached affirmation of Svetlana M. Eisenberg, in support of this motion, dated April 12, 2023, and upon all the pleadings and proceedings in this action to date, including in particular the NRA's motion for a sealing order filed on March 31, 2023 (NYSCEF 1769) and documents in support of that motion (NYSCEF 1770, 1779, and 1789), the National Rifle Association of America (“the NRA”), 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 May 10, 2023, or as soon thereafter as counsel may be heard, for an order permitting pursuant to 22 N.Y.C.R.R. § 216.1 the filing in redacted form of the document identified in the accompanying memorandum of law in order to protect information related to the terms of a confidential settlement agreement.

**PLEASE TAKE FURTHER NOTICE** that, subject to any order of the Court, any opposition to the motion is due on, or before, May 2, 2023, or at such other time as set by the Court.

Dated: April 12, 2023

Respectfully Submitted,

By: /s/ Svetlana M. Eisenberg  
Svetlana M. Eisenberg  
[sme@brewerattorneys.com](mailto:sme@brewerattorneys.com)

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**COUNSEL FOR THE NATIONAL RIFLE  
ASSOCIATION OF AMERICA**