

Motion Sequence No. ____

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

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PEOPLE OF THE STATE OF NEW YORK, BY	:	Index No. 451625/2020
LETITIA JAMES, ATTORNEY GENERAL OF	:	
THE STATE OF NEW YORK,	:	IAS Part 3
	:	
Plaintiff,	:	Hon. Joel M. Cohen
	:	
v.	:	NOTICE OF MOTION
	:	
THE NATIONAL RIFLE ASSOCIATION OF	:	
AMERICA, WAYNE LAPIERRE,	:	
WILSON PHILLIPS, JOHN FRAZER, and	:	
JOSHUA POWELL,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the attached Affirmation of P. Kent Correll dated March 31, 2023, the exhibits annexed thereto, Defendant Wayne LaPierre’s Memorandum of Law in Support of Motion for a Sealing Order dated March 31, 2023, and all other papers, pleadings and proceedings in this action, Defendant Wayne LaPierre, by undersigned counsel, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motion Submission Part, Room 130, at 60 Centre Street, New York, New York 10007, at 9:30 a.m. on April 17, 2023, or as soon thereafter as counsel may be heard, for an order pursuant to 22 N.Y.C.R.R. § 216.1 permitting the filing under seal of the “Documents” as that term is defined in the accompanying memorandum of law, and granting such other and further relief as this Court deems just and proper, on the grounds that certain information in the “Documents” is sensitive from a personal security standpoint and should be maintained under seal for good, sound and valid security reasons.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), any answering affidavits, or other answering papers, must be served upon the undersigned at least seven days

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prior to the return date of this motion, or at such other time as set by the Court.

Dated: New York, New York
March 31, 2023

Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
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Attorney for Defendant Wayne LaPierre

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 31st day of March 2023.

/s/ P. Kent Correll
P. Kent Correll