FILED: NEW YORK COUNTY CLERK 03/24/2023 11:17 PM

NYSCEF DOC. NO. 1689

INDEX NO. 451625/2020

RECEIVED NYSCEF: 03/24/2023

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

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.

Index No. 451625/2020

Motion Sequence No. ___

Hon. Joel M. Cohen

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Affirmation of Jonathan Conley, dated March 24, 2023, the exhibits annexed thereto, and the Memorandum of Law, dated March 24, 2023, in support of this motion, and all other papers, pleadings and proceedings in this action, the People of the State of New York, by their undersigned counsel, will move this Court, 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. EST on Monday, April 12, 2023 or as soon thereafter as counsel may be heard, for an order granting Plaintiff's motion to exclude some or all of the evidence and testimony of Defendant National Rifle Association of America's proffered expert witnesses Ryan Sullivan, Bruce L. Blacker, Matthew Lerner, and Amish Mehta, as well as such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with CPLR 2214(b), any opposition must be filed at least seven days before the return date or such other date as agreed to by the parties or ordered by the Court.

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Dated: March 24, 2023

New York, New York

LETITIA JAMES

Attorney General of the State of New York

/s/ Jonathan Conley

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