

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 William Wang, 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 testimony of Defendants' experts Alan A. Nadel, Michael Dennis Graham, James F. Reda, and J. Lawrence Cunningham, 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.

Dated: March 24, 2023  
New York, New York

LETITIA JAMES  
*Attorney General of the State of New York*

/s/ William Wang  
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MEGHAN FAUX, *Chief Deputy Attorney General for Social Justice*  
JAMES SHEEHAN, *Chief of the Charities Bureau*  
EMILY STERN, *Co-chief of the Enforcement Section, Charities Bureau*  
MONICA CONNELL, *Senior Litigation Counsel, Charities Bureau*  
*Of Counsel*