

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	§	Index No. 451625/2020
OF THE STATE OF NEW YORK,	§	Hon. Joel M. Cohen
	§	
Plaintiff,	§	Motion Sequence No. _____
	§	
v.	§	
	§	
THE NATIONAL RIFLE ASSOCIATION OF	§	<u>NOTICE OF MOTION</u>
AMERICA, WAYNE LAPIERRE, WILSON	§	
PHILLIPS, JOHN FRAZER, and JOSHUA	§	
POWELL,	§	
	§	
Defendants.	§	

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the Memorandum Of Law In Support Of Defendant The National Rifle Association Of America’s Motion To Seal NYSCEF 1326, 1427, 1430, 1437, 1451, 1453, 1455, 1456, the Affirmation In Support Of Defendant The National Rifle Association Of America’s Motion To Seal NYSCEF 1326, 1427, 1430, 1437, 1451, 1453, 1455, 1456, and all pleadings and proceedings in this action to date, Defendant the National Rifle Association of America (“NRA”), by and through 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 19, 2023, or at such other time as the Court may direct, for an order, pursuant to 22 NYCRR §216.1, sealing portions of NYSCEF 1326, 1427, 1430, 1437, 1451, 1453, 1455, and 1456 because these document contain Confidential material related to the identities of potential whistleblowers.

PLEASE TAKE FURTHER NOTICE that any opposition to the motion is due on or before May 12, 2023, or at such other time as set by the Court or agreed upon by the parties.

Respectfully submitted,

Dated: April 6, 2023
New York, New York

/s/ Christopher T. Zona
Christopher T. Zona
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**COUNSEL FOR DEFENDANT
THE NATIONAL RIFLE
ASSOCIATION OF AMERICA**

CERTIFICATE OF SERVICE

I, Christopher T. Zona, hereby certify that, on April 6, 2023, a true and correct copy of the foregoing document was electronically transmitted and served upon all counsel of record via this Court's electronic case filing system.

Dated: April 6, 2023
New York, New York

/s/ Christopher T. Zona
Christopher T. Zona