

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
(Cohen, J.)

**STIPULATION AND
PROPOSED ORDER
SETTING BRIEFING SCHEDULE
ON MOTIONS TO SEAL
SEQ. NOS. 59 AND 60**

WHEREAS, Defendants Wayne LaPierre and National Rifle Association of America
filed motions to seal at Motion Sequences 59 and 60, respectively;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
counsel for the respective parties that opposition to pending motions 59 and 60 to seal shall be
filed on May 12, 2023, and replies shall be filed on June 5, 2023, upon the Court's endorsement:

IT IS FURTHER STIPULATED AND AGREED that this Stipulation can be executed
in counterparts and/or by using electronic, scanned or telefaxed signatures, with the same effect
as original signatures.

IN WITNESS WHEREOF, this Stipulation is executed by counsel for the parties on the pending motions on April 7, 2023.

For Plaintiff

ATTORNEY GENERAL
OF THE STATE OF NEW YORK

/s Sharon Sash

By: _____

Sharon Sash
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For Defendant The National Rifle
Association of America

BREWER, ATTORNEYS AND
COUNSELORS

/s Svetlana Eisenberg

By: _____

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Noah Peters
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For Defendant Wayne LaPierre

CORRELL LAW GROUP

By: */s P. Kent Correll* _____

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SO ORDERED:

Hon. Joel M. Cohen, J.S.C.