

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

-----X	
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.	:
-----X	

Index No. 451625/2020

IAS Part 3

Hon. Joel M. Cohen

**NOTICE OF
CROSS-MOTION
FOR LEAVE TO
AMEND ANSWER**

PLEASE TAKE NOTICE that, pursuant to CPLR 2215 and CPLR 3025(b), upon Defendant Wayne LaPierre's Memorandum of Law in Opposition to Plaintiff's Motion to Dismiss Certain Affirmative Defenses and in Support of His Cross-Motion for Leave to Replead Certain of His Affirmative Defenses dated March 13, 2023, in opposition to Plaintiff The Attorney General of the State of New York's Motion to Dismiss Certain of Defendants' Affirmative Defenses pursuant to CPLR 3211(b) or, alternatively, pursuant to CPLR 3212, and in support of his Cross-Motion for leave to amend his answer to replead certain affirmative defenses under CPLR 3025(b) and (c), his Counterstatement of Facts pursuant to 22 N.Y.C.R.R. § 202.8-g(b) and Commercial Division Rule 19-a(b), and the Affirmation of P. Kent Correll dated March 13, 2023, with the exhibits annexed thereto, and the Affidavit of Wayne LaPierre sworn to on March 13, 2023, and all other papers, pleadings and proceedings in this action, Defendant Wayne LaPierre, by and through his attorney P. Kent Correll, of Correll Law Group, 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

March 29, 2023, for an Order:

(1) Granting Defendant LaPierre leave to amend his answer pursuant to CPLR 3025(b) and (c) to replead certain affirmative defenses; and

(2) Granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b) and CPLR 2215, any answering affidavits, or other answering papers, and any notice of cross-motion (if permitted) and accompanying papers, must be served upon the undersigned at least seven days prior to the return date of this motion.

Dated: New York, New York
March 13, 2023

Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
CORRELL LAW GROUP
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: (212) 475-3070
E-mail: kent@correlllawgroup.com

Attorney for Defendant Wayne LaPierre

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 13th day of March 2023.

/s/ P. Kent Correll
P. Kent Correll