

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. 056
	§	Oral Argument: June 8, 2023
v.	§	
	§	<u>AFFIRMATION IN SUPPORT</u>
	§	<u>OF OPPOSITION TO</u>
THE NATIONAL RIFLE ASSOCIATION OF	§	<u>PLAINTIFF’S MOTION TO</u>
AMERICA, WAYNE LAPIERRE, WILSON	§	<u>EXCLUDE DEFENSE EXPERT</u>
PHILLIPS, JOHN FRAZER, and JOSHUA	§	<u>OPINIONS OF NADEL,</u>
POWELL,	§	<u>GRAHAM, REDA, AND</u>
	§	<u>CUNNINGHAM</u>
Defendants.	§	

AFFIRMATION IN SUPPORT OF
DEFENDANT THE NATIONAL RIFLE ASSOCIATION OF AMERICA’S
OPPOSITION TO PLAINTIFF’S MOTION TO EXCLUDE DEFENSE
EXPERT OPINIONS OF NADEL, GRAHAM, REDA, AND
CUNNINGHAM

I, Christopher T. Zona, an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirm under penalty of perjury pursuant to CPLR §2106 as follows:

1. I am Counsel with the law firm Brewer, Attorneys & Counselors, counsel for Defendant the National Rifle Association of America (“NRA”).
2. I am familiar with the facts and circumstances set forth herein.
3. I submit this Affirmation in support of the NRA’s Memorandum Of Law In Opposition To Plaintiff’s Motion To Exclude Defense Expert Opinions Of Nadel, Graham, Reda, And Cunningham (Mot. Seq. 056).

4. Attached hereto as **Exhibit A** is a true and correct copy of 26 CFR §1.132-5,
Working condition fringes.

Dated: May 5, 2023
New York, New York

/s/ Christopher T. Zona
Christopher T. Zona
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CERTIFICATION OF COMPLIANCE

I hereby certify pursuant to Rule 17 of the Rules of Practice for the Commercial Division of the Supreme Court of the State of New York that the total number of words in the foregoing document, exclusive of the caption, table of contents, table of authorities and signature block, is 143 according to the “Word Count” function of Microsoft Word, the word-processing system used to prepare the document, and thus that the document complies with the word count limit set forth in Rule 17.

Dated: May 5, 2023
New York, NY

/s/ Christopher T. Zona
Christopher T. Zona

CERTIFICATE OF SERVICE

I, Christopher T. Zona, hereby certify that, on May 5, 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: May 5, 2023
New York, NY

/s/ Christopher T. Zona
Christopher T. Zona