

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

**AFFIRMATION OF
SHARON SASH IN
OPPOSITION TO THE
MOTIONS BY DEFENDANT
THE NATIONAL RIFLE
ASSOCIATION OF
AMERICA AND JOHN
FRAZER TO PRECLUDE
EVIDENCE PURSUANT TO
CPLR 3126**

Sharon Sash, an attorney duly admitted to practice before the Courts of this State, hereby affirms the following under the penalty of perjury pursuant to CPLR § 2106:

1. I am an Assistant Attorney General in the Enforcement Section of the Charities Bureau of the Office of the New York State Attorney General (“OAG” or “Attorney General”) and am fully familiar with the facts stated herein based upon my personal knowledge, review of the prior proceedings had herein, and my review of records maintained by this Office.

2. I submit this affirmation in opposition to the applications by the National Rifle Association of America (“NRA”) and Defendant John Frazer pursuant to CPLR 3126 to strike portions of the Complaint, or for preclusion, or to compel further responses to contention interrogatories pursuant to CPLR 3124, and to vacate the note of issue.

3. Annexed hereto as Exhibit A is a true and correct copy of the First Set of Interrogatories of Defendant Counterclaim-Plaintiff, the National Rifle Association of America to

Plaintiff-Counterclaim-Defendant Letitia James, Attorney General of the State Of New York, in Her Official and Individual Capacities, dated January 16, 2022.

4. Annexed hereto as Exhibit B is a true and correct copy of the Responses and Objections of Plaintiff the People of the State of New York to Defendant NRA's First Set of Interrogatories, dated February 7, 2022.

5. Annexed hereto as Exhibit C is a true and correct copy of Defendant John Frazer's Second Interrogatories Seeking the Claims and Contentions of Plaintiff, dated October 19, 2022.

6. Annexed hereto as Exhibit D is a true and correct copy of Plaintiff's Responses and Objections to Defendant John Frazer's Second Set of Interrogatories Seeking the Claims and Contentions of Plaintiff, dated February 9, 2023.

7. Annexed hereto as Exhibit E is a true and correct copy of Defendant NRA's Objections and Responses to New York Attorney General's First Set of Interrogatories, dated November 22, 2022.

8. Annexed hereto as Exhibit F is a true and correct copy of Defendant John Frazer's Responses and Objections to Plaintiff's First Set of Interrogatories, dated November 22, 2022.

Dated: New York, New York
May 5, 2023

/s Sharon Sash

Sharon Sash

Attorney Certification Pursuant to Commercial Division Rule 17

I, Sharon Sash, an attorney duly admitted to practice law before the courts of the State of New York, certify that the foregoing Affirmation of Sharon Sash in Opposition to the Motions by Defendant The National Rifle Association of America and John Frazer to Preclude Evidence Pursuant to CPLR 3126 contains 353 words, excluding the parts exempted by Rule 17 of the Commercial Division of the Supreme Court (22 NYCRR 202.70(g)). In preparing this certification, I have relied on the word count of the word-processing system used to prepare this memorandum of law.

Dated: May 5, 2023
New York, New York

/s Sharon Sash
Sharon Sash