

Mot. Seq. No. 47, 53, 55

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORKPEOPLE 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, INC., WAYNE LAPIERRE,
WILSON PHILLIPS, JOHN FRAZER, and
JOSHUA POWELL,

Defendants.

Index No. 451625/2020

**AFFIRMATION OF
WILLIAM WANG IN SUPPORT
OF PLAINTIFF'S OPPOSITION
TO DEFENDANT NRA'S
MOTION TO EXCLUDE
EXPERT TESTIMONY OF DR.
ERICA HARRIS**

William Wang, an attorney duly admitted to practice before the Courts of this State, hereby affirms the following under the penalty of perjury pursuant to Civil Practice Law and Rules § 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"). I am fully familiar with the facts and circumstances stated herein and documents annexed hereto based upon my personal knowledge, review of the prior proceedings in this action, and review of records maintained by the OAG.

2. I submit this affirmation in support of Plaintiff's opposition to Defendant National Rifle Association of America, Inc.'s ("NRA's") Motion to Exclude Expert Testimony of Dr. Erica Harris, Mot. Seq. 47.

3. Attached as **Exhibit A** is a true and correct copy of excerpts from the deposition transcript of the NRA's Corporate Representative, Day 1, dated July 29, 2022 ("Corp. Rep. Dep.").

4. Attached as **Exhibit B** is a true and correct copy of excerpts from the deposition

transcript of Mildred Hallow, dated January 20, 2022 (“Hallow Dep.”).

5. Attached as **Exhibit C** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

6. Attached as **Exhibit D** is a true and correct copy of the Rebuttal Expert Report of Dr. Erica Harris, dated October 7, 2022 (“Harris Rebuttal Report”).

7. Pursuant to paragraph 14 of the So ordered Stipulation and Order for the Production and Exchange of Confidential Information filed October 25, 2022 (NYSCEF 869 (“Protective Order”)), **Exhibits C and D** attached to this affirmation will be filed in redacted or sealed form, and will be replaced with their corresponding unredacted versions absent a timely motion to seal.

Dated: New York, New York
May 5, 2023

/s William Wang

William Wang