FILED: NEW YORK COUNTY CLERK 05/12/2023 10:47 PM INDEX NO. 451625/2020

NYSCEF DOC. NO. 1911

RECEIVED NYSCEF: 05/12/2023

EXHIBIT A

NYSCEF DOC. NO. 1911

INDEX NO. 451625/2020

RECEIVED NYSCEF: 05/12/2023

From: Kent Correll

To: Sash, Sharon

Cc: <u>Svetlana Eisenberg</u>; <u>Connell, Monica</u>

Subject: Re: Sealing Motion: L. Cunningham Deposition Excerpts

Date: Monday, May 8, 2023 12:50:55 PM

Counsel,

I have reviewed these on behalf of Mr. LaPierre and Mr. LaPierre position is the same as the NRA's.

Best.

Kent

On Mon, May 8, 2023 at 10:30 AM Sash, Sharon < Sharon.Sash@ag.ny.gov > wrote:

Thank you – we will review.

Sharon

From: Svetlana Eisenberg < sme@brewerattorneys.com>

Sent: Monday, May 8, 2023 9:26 AM

To: Sash, Sharon < Sharon.Sash@ag.ny.gov>

Cc: Kent Correll < kent@correlllawgroup.com >; Connell, Monica

< Monica. Connell@ag.ny.gov>

Subject: Sealing Motion: L. Cunningham Deposition Excerpts

[EXTERNAL]

Sharon,

Pursuant to our meet and confer, the NRA's responses to your questions are attached. They are contained within comments. Kent, who has not had a chance to review the attached on behalf of Wayne LaPierre, may have additional comments.

Available to discuss if helpful.

Thanks.

Regards,

Svetlana

NYSCEF DOC. NO. 1911

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INDEX NO. 451625/2020

Svetlana M. Eisenberg | Partner

Brewer, Attorneys & Counselors

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From: Svetlana Eisenberg < sme@brewerattorneys.com>

Sent: Friday, May 5, 2023 3:19 PM

To: Sharon Sash (Sharon.Sash@ag.ny.gov) < sharon.sash@ag.ny.gov>

Cc: Kent Correll < kent@correlllawgroup.com >

Subject: Update

Sharon,

A quick update. I will send responses to NYAG's questions regarding Lawrence

NYSCEF DOC. NO. 1911

INDEX NO. 451625/2020

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Cunningham's deposition by Monday morning.

To the extent we do not withdraw the motion, we provide an explanation and will be available to discuss further if helpful.

Thanks.

Regards,

Svetlana

Svetlana M. Eisenberg | Partner

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INDEX NO. 451625/2020

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P. Kent Correll, Esq.

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Email: kent@correlllawgroup.com

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NYSCEF DOC. NO. 1911

INDEX NO. 451625/2020

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From: Svetlana Eisenberg
To: Sash, Sharon

Cc: Kent Correll; Connell, Monica

Subject: Sealing Motion: L. Cunningham Deposition Excerpts

Date: Monday, May 8, 2023 9:27:17 AM
Attachments: Lawrence Cunningham.docx

[EXTERNAL]

Sharon,

Pursuant to our meet and confer, the NRA's responses to your questions are attached. They are contained within comments. Kent, who has not had a chance to review the attached on behalf of Wayne LaPierre, may have additional comments.

Available to discuss if helpful.

Thanks. Regards, Svetlana

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From: Svetlana Eisenberg <sme@brewerattorneys.com>

Sent: Friday, May 5, 2023 3:19 PM

To: Sharon Sash (Sharon.Sash@ag.ny.gov) <sharon.sash@ag.ny.gov>

Cc: Kent Correll <kent@correlllawgroup.com>

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Subject: Update

Sharon,

A quick update. I will send responses to NYAG's questions regarding Lawrence Cunningham's deposition by Monday morning.

To the extent we do not withdraw the motion, we provide an explanation and will be available to discuss further if helpful.

Thanks.

Regards,

Svetlana

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