

Motion Sequence No. ____

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK – COMMERCIAL DIVISION

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PEOPLE OF THE STATE OF NEW YORK, BY	:	Index No. 451625/2020
LETITIA JAMES, ATTORNEY GENERAL OF	:	
THE STATE OF NEW YORK,	:	IAS Part 3
	:	
Plaintiff,	:	Hon. Joel M. Cohen
	:	
v.	:	NOTICE OF MOTION
	:	
THE NATIONAL RIFLE ASSOCIATION OF	:	
AMERICA, WAYNE LAPIERRE,	:	
WILSON PHILLIPS, JOHN FRAZER, and	:	
JOSHUA POWELL,	:	Oral Argument Requested
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the Notice of Motion of Defendant the National Rifle Association of America (NYSCEF 1934), the Memorandum of Law in Support of Defendant the National Rifle Association of America’s Motion for a Sealing Order (NYSCEF 1935), the Affirmation in Support of Defendant the National Rifle Association of America’s Motion for a Sealing Order (NYSCEF 1936), the exhibits annexed thereto, 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, pursuant to Section VI(D) of this Court’s Part 3 Practices and Procedures (revised June 23, 2022), joins in the National Rifle Association of America’s motion for a sealing order, incorporates by reference the facts, evidence, legal arguments and authorities set forth in the aforementioned motion papers filed by Defendant the National Rifle Association of America in support of its motion, and 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 June 1, 2023, or at such other time as the Court may direct, for an order sealing passages in the NYAG’s proposed expert witness rebuttal report of

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Jeffrey Tenenbaum revealing confidential information pertaining to the safety and security of an NRA employee, and granting such other and further relief as this Court deems just and proper, on the grounds that good cause exists for sealing certain passages of the rebuttal report to protect the safety and security of an NRA employee.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), any answering affidavits, or other answering papers, must be served upon the undersigned at least seven days prior to the return date of this motion, or at such other time as set by the Court or agreed upon by the parties.

Dated: New York, New York
May 12, 2023

Respectfully submitted,

/s/ P. Kent Correll

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Attorney for Defendant Wayne LaPierre

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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 12th day of May 2023.

/s/ P. Kent Correll
P. Kent Correll