

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  
(Cohen, J.)

**STIPULATION AND  
PROPOSED ORDER  
SETTING BRIEFING SCHEDULE  
ON MOTIONS TO SEAL AT  
NYSCEF 1795, 1805 (MOT. SEQ.  
61), AND 1816**

**WHEREAS** Wayne LaPierre and the National Rifle Association of America  
(the “NRA”) moved for sealing orders in Motion Sequence Nos. 59 and 60, respectively;

**WHEREAS** the NRA, Wayne LaPierre and the NYAG stipulated—and the Court  
so-ordered—that any oppositions by the NYAG to Motion Sequence Nos. 59 and 60 shall be  
filed on or before May 12, 2023, and any replies in further support of these motions shall be filed  
on or before June 5, 2023 (NYSCEF 1827 and 1828);

**WHEREAS** the NRA also sought sealing relief in three subsequent motions (Notices of  
Motion at NYSCEF 1795, 1805 (Mot. Seq. 61), and 1816);

**WHEREAS** the NYAG and the NRA agree that the briefing schedule for the three  
subsequent motions should be the same as for Motion Sequence Nos. 59 and 60;

**IT IS HEREBY STIPULATED AND AGREED** that any opposition by the NYAG to  
pending motions at NYSCEF 1795, 1805 (Mot. Seq. 61), and 1816 shall also be filed on or  
before May 12, 2023, and any replies in further support of these three motions shall be filed on or  
before June 5, 2023;

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation can be executed in counterparts and/or by using electronic, scanned or telefaxed signatures, with the same effect as original signatures.

**IN WITNESS WHEREOF**, this Stipulation is executed by counsel for the parties on the pending motions on May 3, 2023.

For Plaintiff

ATTORNEY GENERAL  
OF THE STATE OF NEW YORK

*/s Sharon Sash*

By: \_\_\_\_\_

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For The National Rifle Association  
of America

BREWER, ATTORNEYS AND  
COUNSELORS

*/s Svetlana M. Eisenberg*

By: \_\_\_\_\_

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Christopher Zona  
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Tel. (212) 527-2587

SO ORDERED:

\_\_\_\_\_  
Hon. Joel M. Cohen, J.S.C.