

# EXHIBIT B

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, INC., WAYNE LAPIERRE,  
WILSON PHILLIPS, JOHN FRAZER, and  
JOSHUA POWELL,

Defendants.

Index No. 451625/2020

**EXPERT DISCLOSURE**

Pursuant to the Fifth Revised Scheduling Order dated August 11, 2022 and the requirements of CPLR § 3101(d)(1)(i) and Commercial Division Rule 13(c), plaintiff People of the State of New York by Letitia James, Attorney General of the State of New York makes the following disclosures concerning Eric A. Hines, an expert witness she intends to call at trial as part of her case-in-chief:

I. The Expert's Opinion

- A. A complete statement of all opinions Mr. Hines will express and the basis for those opinions is set forth in Mr. Hines' expert report which is annexed hereto as Exhibit A.
- B. The data or other information considered by Mr. Hines in forming the opinion(s) is set forth in a list annexed hereto as Appendix 2 of Exhibit A.

II. Expert's Qualifications and Compensation

- A. Mr. Hines' qualifications are set forth in his report and in his *curriculum vitae*

annexed hereto as Appendix 1 of Exhibit A.

- B. A list of all publications authored by Mr. Hines in the previous ten years is included within Appendix 1 of Exhibit A.
- C. A list of all other cases at which Mr. Hines testified as an expert at trial or by deposition during the previous four years is included within Appendix 1 of Exhibit A.
- D. A statement of the compensation to be paid to Mr. Hines for the study and testimony in this case is included within his expert report annexed hereto as Exhibit A.

Date: September 16, 2022  
New York, New York

LETITIA JAMES  
Attorney General of the  
State of New York

By: /s/ Monica Connell  
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