

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: _____

Sharon Sash
28 Liberty Street
New York, New York 10005
Tel. (212) 416-8401

For The National Rifle Association
of America

BREWER, ATTORNEYS AND
COUNSELORS

/s Svetlana M. Eisenberg

By: _____

Svetlana Eisenberg
Christopher Zona
750 Lexington Avenue, 14th Floor
New York, New York 10005
Tel. (212) 527-2587

SO ORDERED:

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