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October 16, 2024

Via NYSCEF

Hon. Joel M. Cohen
Supreme Court of the State of New York
New York County, Commercial Division
60 Centre Street
New York, NY 10007

Re: *People by James v. Nat'l Rifle Ass'n of Am., Wayne LaPierre, Wilson Phillips, John Frazer and Joshua Powell*, Index No. 451625/2020 (Sup. Ct., N.Y. County), Part 3 (Cohen, J.)

Dear Justice Cohen,

Defendant Wayne LaPierre objects to the proposed judgments submitted by the plaintiff attorney general (NYSCEF 3581) and the NRA (NYSCEF 3592) on the grounds that (1) neither accurately and completely tracks the relief granted by this Court's decisions and orders and the jury's verdict; and (2) each contains content that is unnecessary and inappropriate.¹

Mr. LaPierre respectfully submits his proposed counter-judgment, which accurately and completely reflects the Court's decisions and orders and the jury's verdict and contains only content that is necessary and appropriate, attached hereto as Exhibit 1.²

¹ For instance, the attorney general's proposed judgment indicates that Mr. LaPierre will be required to pay money to the attorney general, when the N-PCL makes no provision for payment of money to the attorney general. Also, the attorney general's proposed judgment provides for costs and disbursements when, under all of the circumstances, allowing costs and disbursements to the attorney general would not be equitable because Mr. LaPierre, the NRA and two of the other defendants prevailed on many causes of action and issues, and the NRA prevailed on the main issue of whether the Court should order judicial dissolution. In addition, the NRA's proposed judgment contains language regarding payment, execution, collection, assignment and retention of jurisdiction that is unnecessary and inappropriate for inclusion in a judgment. Moreover, both proposed judgments omit any reference to the Court's dismissal of causes of action prior to the jury phase of the trial, thus leaving each judgment inaccurate and incomplete.

² In submitting this proposed counter-judgment, Mr. LaPierre is reserving all rights and waiving none, including, without limitation, the right to appeal from any final judgment.

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Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
Counsel for Defendant Wayne LaPierre

cc: All Counsel of Record (by NYSCEF)