

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

-----X		
PEOPLE OF THE STATE OF NEW YORK,	:	Index No. 451625/2020
BY LETITIA JAMES, ATTORNEY GENERAL	:	
OF THE STATE OF NEW YORK,	:	Part 3
	:	
Plaintiff,	:	Hon. Joel M. Cohen
	:	
v.	:	
	:	
THE NATIONAL RIFLE ASSOCIATION	:	
OF AMERICA, INC., WAYNE LAPIERRE,	:	
WILSON PHILLIPS, JOHN FRAZER, and	:	
JOSHUA POWELL,	:	
	:	
Defendants.	:	
-----X		

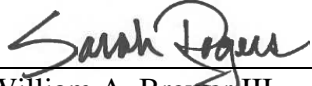
**DEMAND UNDER CPLR RULE 511(b) FOR CHANGE OF PLACE OF TRIAL
ON THE GROUND THAT THE COUNTY DESIGNATED FOR THAT PURPOSE
IS NOT A PROPER COUNTY**

PLEASE TAKE NOTICE that Defendant The National Rifle Association of America hereby demands, pursuant to CPLR Rule 510, subdivisions (1) and (3), and CPLR Rule 511, subdivisions (a) and (b), that the place of trial of the above-entitled action be changed from New York County, in which it has been improperly placed, to Albany County, where venue would be proper, as required by N-PCL § 1110.

Dated: October 19, 2020

Respectfully submitted,

**BREWER, ATTORNEYS &
COUNSELORS**

By: 

William A. Brewer III
wab@brewerattorneys.com
Sarah B. Rogers
sbr@brewerattorneys.com
750 Lexington Avenue, 14th Floor
New York, New York 10022
Telephone: (212) 489-1400

Facsimile: (212) 751-2849

ATTORNEYS FOR DEFENDANT