

Motion Sequence 001

**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
et al.,**

Defendants.

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§ **NOTICE OF MOTION**
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§ **INDEX NO. 451625/2020**
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PLEASE TAKE NOTICE, that upon the annexed affidavit of Sarah B. Rogers sworn to on October 19, 2020, upon the exhibits annexed thereto, and the memorandum of law, dated October 19, 2020, in support of this motion, and all other papers, pleadings and proceedings in this action, Defendant The National Rifle Association, by their undersigned attorneys, will move this Court, before the Honorable Justice Joel M. Cohen, at the Supreme Court, New York County, Motions Submissions Part, Room 130 at 60 Centre Street, New York, NY 10007 at 9:30 a.m. on Tuesday, November 19, 2020, for an Order:

1. Pursuant to CPLR 327(a), dismissing this action on the basis of *forum non conveniens*;
2. Pursuant to CPLR 3211(a)(4), dismissing or staying this action because of pending litigation between the parties;
3. Pursuant to CPLR 3211(a)(1), dismissing or staying this action for improper venue;

4. Pursuant to CPLR 2201, staying this action pending the resolution of related federal cases; and

5. Granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's direction, reply papers, if any, must be served upon the undersigned on or before November 12, 2020.

Dated: October 19, 2020

Respectfully submitted,

By: /s/ Sarah B. Rogers

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