DECLARATION OF WILLIAM A. BREWER IN SUPPORT OF THE NATIONAL RIFLE ASSOCIATION'S MOTION TO TRANSFER CASES FOR CONSOLIDATED PRE-TRIAL PROCEEDINGS PURSUANT TO 28 U.S.C. § 1407

I, William A. Brewer, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age, and fully competent to make this declaration. I am an associate with the law firm of Brewer, Attorneys & Counselors ("BAC"), 750 Lexington Avenue, 14th Floor, New York, New York 10022. I am counsel for the National Rifle Association of America (the "NRA") in the matter captioned Dell'Aquila v. LaPierre et al., Civ. Case No. 3:19-cv-00679 (M.D. Tn.) (the "Dell'Aquila Litigation"). I respectfully submit this declaration in support of the NRA's Motion to Transfer Cases for Consolidated Pre-Trial Proceedings Pursuant to 28 U.S.C. § 1407 (the "Consolidation Motion"). Unless otherwise stated, I have personal knowledge of all matters stated herein.

2. Attached as Exhibit A hereto is true and correct copy of the Second Amended Complaint. Attached as Exhibit B hereto is a true and correct copy of the NRA's Answer and Affirmative Defenses. These documents collectively constitute the operative pleadings in the Dell'Aquila Litigation. Attached as Exhibit C hereto is a true and correct copy of the current docket summary for the Dell'Aquila Litigation, generated via PACER/ECF.

3. The Initial Case Management Conference in the Dell'Aquila Litigation is scheduled to take place on November 6, 2020 (Docket No. 65). Fact discovery will begin shortly and will be voluminous. Attached hereto as Exhibit D is a list of individuals or entities likely to have relevant information or documents.

4. Significant issues of fact in the Dell'Aquila Litigation include: the NRA's dealings with its former public relations agency, Ackerman McQueen, Inc. ("Ackerman"), including knowledge and intent on the part of NRA executives regarding Ackerman's activities and billing;[1] the NRA's stewardship of its finances;[2] the veracity of allegations of misspending by former NRA fiduciaries including Lt. Col. Oliver North;[3] and, the NRA's legal fees.[4]

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of October 2020 in New York, New York.



William A. Brewer

[1] *See* Ex. A ¶¶ 49, 74.

[2] *See* Ex. A ¶¶ 41-54, 74.

[3] *See* Ex. A ¶¶ 44-54.

[4] *See* Ex. A ¶¶ 46-48, 74.