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June 21, 2021

VIA NYSCEF

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

Re: *People of the State of New York, by Letitia James, Attorney General of the State of New York v. The National Rifle Association of America, Inc. et al.*, Index No. 451625/2020

Dear Justice Cohen:

On behalf of the Plaintiff, the Attorney General, we respectfully submit this letter to request that the word count limit for the Attorney General's memorandum of law in support of her motion to dismiss Defendant National Rifle Association of America ("NRA")'s counterclaims, NYSCEF No. 230, be increased pursuant to Commercial Division Rule 17 from 7,000 words to 9,500 words. The NRA consents to this request so long as it receives the same extension of the word count for its opposition memorandum, which the Attorney General does not oppose.

The Attorney General intends to move to dismiss the NRA's seven counterclaims on numerous grounds, including for failure to state a claim, lack of standing, and for reasons involving governmental immunities. The Attorney General's motion is due on June 24, 2021. To adequately address the procedural history of this matter and the Attorney General's numerous defenses, the Attorney General thus respectfully requests permission to file an opening memorandum of law with no more than 9,500 words in support of her motion to dismiss.

Respectfully,

/s/Monica Connell
Assistant Attorney General

cc: All Counsel of Record