

B R E W E R
ATTORNEYS & COUNSELORS

September 14, 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 v. National Rifle Association of America, Inc. et al., Index No. 451625/2020*

Dear Justice Cohen:

We write on behalf of Defendant, the National Rifle Association of America (“NRA”). The NRA intends to move to dismiss claims asserted against the NRA by the Plaintiff, Attorney General of the State of New York, as set forth in the Attorney General’s Amended and Supplemental Verified Complaint (the “Amended Complaint”) (NYSCEF No. 333). The NRA’s motion is due to be filed on September 15, 2021. We respectfully submit this letter to request that the word count limit pursuant to Commercial Division Rule 17 be increased for the NRA’s memorandum of law in support of its motion to dismiss, from 7,000 words to 11,000 words. The Attorney General consents to this request as long as it receives the same increase in word count for its opposition memorandum, to which the NRA consents.

The NRA intends to move to dismiss the Amended Complaint on grounds including failure to state a claim and collateral estoppel. The NRA respectfully requests permission to file an opening memorandum of law in support of its motion to dismiss with an increased word limit to adequately address the numerous factual allegations set forth in the Attorney General’s 189-page Amended Complaint, the history of this matter, the history and factual determinations of the NRA’s federal bankruptcy action, and to adequately set forth its legal arguments. We thank the Court for its attention to this matter.

Respectfully,

/s/ Mordecai Geisler

cc: All Counsel of Record