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September 15, 2021

VIA NYSCEF

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

Re: *People v. Nat'l Rifle Ass'n of Am., Inc., Wayne LaPierre, Wilson Phillips,
John Frazer and Joshua Powell*, Index No. 451625/2020

Dear Justice Cohen,

I write on behalf of Defendant Wayne LaPierre. Mr. LaPierre intends to move to dismiss the causes of action asserted against him in the Amended and Supplemental Verified Complaint ("Amended Complaint") (NYSCEF Doc. No. 333). Mr. LaPierre's motion is due to be filed today. Mr. LaPierre respectfully requests that the word count limit of Commercial Division Rule 17 be increased for his memorandum of law in support of his motion to dismiss from 7,000 words to 11,000 words. The Attorney General consents to this request as long as she receives the same increase in word count for her opposition memorandum, to which Mr. LaPierre consents.

Mr. LaPierre will move to dismiss the Amended Complaint on the ground that the Amended Complaint fails to state a cause of action against him and the Court lacks jurisdiction of the subject matter of the causes of action asserted against him, because the Attorney General lacks authority or standing to assert the causes of action against him, and respectfully requests that the Court allow for the increased word limit so that he can adequately address the allegations set forth in the 189-page Amended Complaint, and set forth his legal arguments.

Thank you for your attention to this matter.

Very truly yours,

/s/ P. Kent Correll

P. Kent Correll
Counsel for Defendant Wayne LaPierre

cc: All Counsel of Record (via NYSCEF)