

**Gage Spencer & Fleming LLP**  
**410 Park Avenue, Suite 810**  
**New York, New York 10022**

**Telephone (212) 768-4900**

November 3, 2021

By NYSCEF

Honorable Joel M. Cohen  
Supreme Court of the State of New York  
New York County  
Commercial Division  
60 Centre Street, Room 570  
New York, New York 10007

Re: *People of the State of New York v. The National Rifle Association, et al.*,  
Index. No. 451625/2020

Dear Justice Cohen:

We represent Defendant John Frazer in the above-referenced action. Currently pending before Your Honor is Mr. Frazer's motion to dismiss (Motion Sequence Number 16). We respectfully submit this letter to request an increase in the word count limit, pursuant to Commercial Division Rule 17, for Mr. Frazer's Reply Brief to 6,600 words, which is the same word count limit the Court previously granted to Defendants the National Rifle Association of America and Wayne LaPierre. *See* NYSCEF Doc. Nos. 342, 344.

Respectfully submitted,

*/s/ William B. Fleming*

William B. Fleming

Cc: Counsel of Record (by NYSCEF)