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By NYSCEF

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

Re: *People v. NRA, et al.*, Index No. 451625/2020
Proposed Third Revised Scheduling Order

Dear Justice Cohen:

We write with consent of the parties and approval of the Special Master to request that Your Honor so-order the accompanying proposed Third Revised Scheduling Stipulation and Order extending the deadlines for discovery by one month.

Since the Special Master's appointment in February, Plaintiff, the People of the State of New York by the Office of the New York Attorney General ("OAG"), has made applications to the Special Master regarding the NRA's document production. The Special Master has been working with the parties to address these matters and, while considerable progress has been made, a number of issues require additional time to resolve. In light of these outstanding discovery issues and the NRA's belated production of 411,799 documents on March 11¹, the OAG made an application to the Special Master on March 31 requesting an extension of fact discovery.

Upon hearing argument on this and other applications, the Special Master directed the parties to meet and confer and provide the Special Master with an amended discovery schedule to review. The parties met and conferred and agreed to the dates reflected in the accompanying

¹ The Court directed the parties to complete document production and certify production as complete by February 28, with an extension to March 10. Feb. 15, 2022 Hearing T. 9:1-11.

proposed Third Revised Scheduling Order.² The Special Master has reviewed and approved the proposed schedule.

For these reasons, we respectfully request that Your Honor so-order the accompanying proposed Third Revised Scheduling Order extending the deadlines for discovery by one month.

Respectfully,

/s/ Monica Connell

Monica Connell
Assistant Attorney General

cc: All Counsel of Record

² The NRA consents to the proposed schedule “provided that additional time is allotted for counterclaim discovery as appropriate.”