



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer Direct: (518) 776-2620

December 22, 2021

By ECF

Hon. Mae A. D'Agostino
U.S. District Court
Northern District of New York
James T. Foley Courthouse
445 Broadway
Albany, NY 12207

Re: *National Shooting Sports Foundation, et al. v. James*, 21-CV-1348 (N.D.N.Y.)
(MAD/CFH)

Dear Judge D'Agostino:

This Office represents Defendant Letitia James, sued in her official capacity as New York Attorney General (“Defendant”), in the above-referenced action. I write pursuant to Rule 1 of Your Honor’s Individual Rules of Practice to respectfully request a three-week extension of Defendant’s time to respond to Plaintiffs’ Complaint (ECF No. 1) and Plaintiffs’ Motion for Preliminary Injunction (ECF No. 2) from January 7, 2022 to January 28, 2022. This is Defendant’s first request for an extension of time to respond to the Complaint and oppose Plaintiffs’ Motion for Preliminary Injunction. Plaintiffs consent to this request.

The additional time is needed because I am currently scheduled to serve as lead counsel for a trial in *Shabazz v. Howard, et al.*, 9:12 CV 1372 (N.D.N.Y.) (BKS/TWD) that is to begin on January 5, 2022, in Syracuse before the Honorable Benda K. Sannes. The preparation for, and the trying of, that case will consume a considerable amount of my time between now and January 7, 2022.

The requested extension will affect the briefing schedule set by Text Order. *See* Dkt. Text Notice, Dec. 21, 2021. Accordingly, pursuant to Your Honor’s Individual Rules of Practice, I have attached a Proposed Scheduling Order to this letter. Thank you very much for your consideration of this request.

Hon. Mae A. D'Agostino
December 22, 2021
Page 2 of 2

Respectfully submitted,

s/ Michael McCartin

Michael G. McCartin
Assistant Attorney General | Special Counsel
Bar No. 511158
Michael.McCartin@ag.ny.gov

cc (via ECF): Counsel of Record