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July 8, 2022

**VIA NYSCEF**

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

Re: *People of the State of New York, by Letitia James, Attorney General of the State of New York v. The National Rifle Association of America, Inc. et al.*, Index No. 451625/2020

Dear Justice Cohen:

We write on behalf of the Plaintiff, the People of the State of New York ("Plaintiff"), by Letitia James, Attorney General of the State of New York. On June 6, 2022, Defendants the National Rifle Association of America ("NRA"), Wayne LaPierre ("LaPierre") and John Frazer ("Frazer") each filed separate motions to dismiss Plaintiff's Second Amended Verified Complaint. Plaintiff intends to submit one omnibus memorandum in opposition to the separate motions to dismiss made by the NRA, LaPierre and Frazer (the "Motions to Dismiss"). In order to respond to all three motions in one memorandum, Plaintiff respectfully requests that the word count limit pursuant to Commercial Division Rule 7 be increased from 7,000 words to 12,500 words for Plaintiff's omnibus memorandum of law in opposition to the Motions to Dismiss. Counsel for Mr. Frazer and Mr. LaPierre consent to this request. Counsel for the NRA has the request under consideration and has neither consented nor denied it at the time of this filing.

We thank the Court for its attention to this matter.

Respectfully,

*/s/ Monica Connell*

Monica Connell  
Assistant Attorney General

cc: All Counsel of Record