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October 12, 2022

Via NYSCEF

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

On behalf of Defendant Wayne LaPierre, pursuant to CPLR 2004, I am writing to request an 8-day extension of Mr. LaPierre's time to answer the Second Amended Verified Complaint in the above-referenced action. The current due date is October 13, 2022. The requested due date is October 21, 2022. The reason for the request is that Mr. LaPierre has been traveling and will not be available to work on the answer until Monday, October 17th.

This is Mr. LaPierre's first request for an extension. No party will suffer any prejudice.

I have requested consent from all parties. Plaintiff has refused to consent, unless Mr. LaPierre agrees to other conditions. Counsel for the NRA, Mr. Frazer and Mr. Phillips have consented. I have not yet heard back from counsel for Mr. Powell.

Accordingly, I respectfully request that the Court grant the extension.

Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
Counsel for Defendant Wayne LaPierre

cc: All Counsel of Record (via NYSCEF)

SO ORDERED

J.S.C.