

P. KENT CORRELL

CORRELL LAW GROUP

250 PARK AVENUE, 7TH FLOOR

NEW YORK, NEW YORK 10177

PHONE: (212) 475-3070

kent@correlllawgroup.com

October 13, 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,

I write on behalf of Mr. LaPierre to reply to Ms. Connell's letter to Your Honor of October 12, 2022.

Although I respectfully disagree with Ms. Connell's characterization of the facts and circumstances outlined in her letter, I will simply confirm that I conveyed to Plaintiff yesterday that I am prepared to consent to an extension of the time to serve contention interrogatories to October 27, 2022, and that I stand ready to sign a stipulation to that effect.

We have scheduled a meet and confer on the issue of amendment of the complaint for 4:00 p.m. today and I hope we will be able to resolve that issue consensually.

Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
Counsel for Defendant Wayne LaPierre

cc: All Counsel of Record (via NYSCEF)