

P. KENT CORRELL

CORRELL LAW GROUP

250 PARK AVENUE, 7TH FLOOR

NEW YORK, NEW YORK 10177

PHONE: (212) 475-3070

kent@correlllawgroup.com

December 1, 2022

Via NYSCEF

Hon. Joel M. Cohen
Supreme Court of the State of New York
New York County, Commercial Division
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 Defendant Wayne LaPierre in response to Ms. Connell's letter of December 1, 2022 (NYSCEF Doc. No. 909), and her submission of a proposed order that has not been agreed upon by all parties (NYSCEF Doc. No. 910).

Mr. LaPierre respectfully disagrees with Plaintiff's characterization of the facts, opposes endorsement of the order, and requests that the Court grant him until December 9, 2022, to respond to the letter.

In the meantime, Mr. LaPierre will meet and confer with the parties in an attempt to reach agreement on a proposed stipulation and order that is acceptable to all parties.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ P. Kent Correll

P. Kent Correll
Counsel for Defendant Wayne LaPierre

cc: All Counsel of Record (via NYSCEF)