

B R E W E R
ATTORNEYS & COUNSELORS

January 3, 2023

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, NY 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 et al.*,
Index No. 451625/2020

Dear Judge Cohen:

On behalf of Defendant the National Rifle Association of America (the “NRA”), we write to apprise the Court of the NRA’s upcoming motion for review—pursuant to CPLR 3104(d)—of a recent ruling by the Special Master for Discovery that raises new, significant privilege issues. The ruling that will be the subject of the NRA’s motion was issued in writing on December 27, 2022; in addition, the NRA’s motion will incorporate a transcript of a conference held earlier today.

The so-ordered stipulation appointing the Special Master (NYSCEF 579) provides for a deadline to move for review within 5 business days of the ruling. The deadline for the motion therefore is January 4, 2023; in this instance, however, the NYAG and the Special Master have each consented to the adjournment of the deadline to January 9, 2023.

The NRA therefore respectfully requests that the Court extend the NRA’s deadline to move for review of the Special Master’s ruling to January 9, 2023. The NRA will supplement this letter with a formal motion for leave if the Court so requests.

Respectfully submitted,

/s/ Noah Peters

William A. Brewer III
Svetlana M. Eisenberg
Noah B. Peters
Sarah B. Rogers

cc:

All parties to the case via ECF