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February 21, 2023

Via NYSCEF

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

Re: People v. Nat'l Rifle Ass'n of Am., Wayne LaPierre, Wilson Phillips,

John Frazer and Joshua Powell, Index No. 451625/2020 (Sup. Ct., N.Y. County),

Part 3 (Cohen, J.)

Dear Justice Cohen,

I write on behalf of Defendant Wayne LaPierre regarding Plaintiff's proposed order (NYSCEF No. 1255) regarding the deadline for filing motions directed to experts. Mr. LaPierre has no objection to extending the deadline to March 24, 2023.

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)