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February 23, 2023

VIA NYSCEF and EMAIL

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

Re: People of the State of New York v. The National Rifle Association of America, et al., Index No. 451625/2020

Dear Justice Cohen:

On behalf of the Plaintiff, the People of the State of New York, the Office of the Attorney General of the State of New York ("OAG") respectfully writes with an update on its request that the briefing schedule for motions directed at experts be extended from March 3, 2023 to March 24, 2023.

Plaintiff wrote to request this extension on February 17, 2023. Two Defendants had consented to the request, with one asking that the new date be set to March 24, 2023. Three Defendants did not consent. The Court gave the three Defendants until February 21, 2023, to set forth the bases for their opposition in writing to the Court. On February 21st, all three Defendants withdrew their objections. Therefore no party objects to this request.

The proposed extension would not impact any other scheduled date, including the summary judgment briefing schedule. Accordingly, Plaintiff respectfully reiterates its request that the date for the expert motions be moved from March 3, 2023 to March 24, 2023. We thank the Court for its attention to this matter.

Respectfully,

Is Monica Connell

Monica Connell

Assistant Attorney General

cc: All Counsel of Record