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March 20, 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,

Pursuant to the Court Notice issued by this Court on March 13, 2023 (NYSCEF 1330), and Commercial Division Rule 30(b)(1), Defendant Wayne LaPierre requests that this Court proceed to a Mandatory Settlement Conference pursuant to Rule 30(b)(1)(D) ("MSC Track D"). We strongly believe that MSC Track D – *i.e.*, participation in a court-ordered mandatory settlement conference before a private neutral – would offer the best chance of securing a just, speedy and inexpensive determination of this action.

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)