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May 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 respectfully writes to request an enlargement of the word-count limit that applies to Plaintiff's consolidated reply memoranda in support of its motions to exclude certain Defendants' expert opinions. On March 24, Plaintiff moved to exclude opinions of eight defense experts. (Mot. Seq. Nos. 56 & 57.) To streamline briefing, Plaintiff filed two consolidated motions covering multiple expert opinions. On March 23, the Court granted our request for an enlargement of the word-count limit and Plaintiff filed two consolidated briefs of 19,052 words in total. On May 5, Defendants the National Rifle Association of America, Wayne LaPierre, and John Frazer filed oppositions to Plaintiffs' two consolidated motions of 24,275 words in total. Plaintiffs' reply memoranda are due on May 26.

To address the Defendants' oppositions to these complex motions, involving multiple experts and hundreds of pages of reports, Plaintiff requests an enlargement of the word-count limit of up to 14,500 words in total, shared across the two consolidated reply briefs.

Respectfully,

/s Jonathan Conley
Jonathan Conley
Assistant Attorney General

cc: All Counsel of Record