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**VIA CM/ECF**

July 2, 2021

The Honorable Patrick J. Schiltz  
United States District Court  
300 South Fourth Street  
Minneapolis, MN 55415  
[schultz\\_chambers@mnd.uscourts.gov](mailto:schultz_chambers@mnd.uscourts.gov)

RE: *My Pillow, Inc. v. US Dominion, Inc., Case No. 21-cv-01015-PJS-DTS*

Judge Schiltz:

I write on behalf of US Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (collectively, "Dominion"). On July 13, 2021, Dominion intends to file motions to transfer under 28 U.S.C. § 1404(a) and dismiss under Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), 12(b)(6), and 28 U.S.C. 1406(a). Rather than file two separate briefs with a combined word count limit of 24,000 words, we request permission to file consolidated moving and reply memoranda in support of these two motions with a word count not to exceed 20,000 words. (Dominion will of course endeavor to come in well under this word count in the end if possible.)

Our request is based on our view of the benefits to the parties and the Court of consolidated moving and reply memoranda. Our request is also based on the number of procedural, jurisdictional, and substantive issues that the motion to transfer and the motion to dismiss will address. At this time, these include (a) personal jurisdiction, (b) venue, (c) doctrines including the first-filed doctrine that control related cases in multiple forums, and (d) failure to state a claim upon which relief can be granted over the five counts in My Pillow's complaint. By our way of counting, permitting Dominion to treat these matters in consolidated moving and reply memoranda trims the total number of words available to discuss these issues from 24,000 to 20,000. But even if the motion to transfer and motion to dismiss were required to be treated as a single motion, the interests of justice would best be served by consolidated treatment of the issues at the length Dominion requests.

For these reasons, Dominion requests that the Court permit Dominion to file a consolidated moving memorandum and a consolidated reply memorandum of no more than 20,000 total words in support of the motions it will file on July 13, 2021.

Very truly yours,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

John W. Ursu

c: All Counsel of Record