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July 17, 2024

By ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Lane v. Rocah, et al.*, No. 22 Civ. 10989 (KMK)

Dear Judge Karas:

The Office of the Attorney General represents Steven G. James, in his official capacity as Superintendent of the New York State Police, in the above-referenced action. Superintendent James writes respectfully (1) to request permission to file a single memorandum of law of 15 pages in length, in further support of his motion for summary judgment, and (2) to request a brief seven-day extension of time to file his reply, from August 2, 2024 to August 9, 2024. Plaintiffs consent to these requests.

One reason for both the page limit request and the additional time is that the Supreme Court recently decided *United States v. Rahimi*, 602 U.S. ___, 2024 WL 3074728 (June 21, 2024), after Superintendent James's summary judgment motion was filed, which was addressed by Plaintiffs in their most recent filing. Additionally, in opposition to Superintendent James's summary judgment motion, Plaintiffs have annexed 99 exhibits totaling over 1,400 pages, and have filed a 56.1 Response of 75-pages. Because of the importance of *Rahimi* and its impact on *Bruen*, and the time and space required to address the evidentiary issues presented by Plaintiffs' most recent filings, Superintendent James respectfully requests an additional five pages and seven days on reply.

Another reason for the seven-day extension of time is that the undersigned has a vacation planned for Friday, July 19, 2024 through Sunday, July 28, 2024, and other members of the litigation team will be taking intermittent leave during that same period.

This is Superintendent James's first request for a page limit extension or an enlargement of time to reply. The Court previously granted a five-page enlargement of Superintendent James's

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25-page brief in support of his motion for summary judgment and in opposition to Plaintiffs' motion for summary judgement. We thank the Court for its consideration of these requests.

Respectfully submitted,

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cc: All counsel of record (via ECF)