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March 21, 2022

By ECF

Hon. Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 6G North

Re: *Edmondson, et al. v. Raniere, et al.*, 1:20-CV-00485-EK-CLP

Dear Judge Komitee:

Pursuant to Fed. R. Civ. P. 6(b), E.D.N.Y. L. Civ. R. 7.1(d), and this Court's Individual Practices and Rules Sections I.C and III.D.2, Defendant Clare Bronfman ("Ms. C. Bronfman") submits this letter motion seeking (1) a two-week extension in time for Ms. C. Bronfman to submit her reply in support of her motion to dismiss and (2) leave to file a reply in excess of 15 pages. In support of her motion she states as follows:

On November 30, 2021, this Court entered a minute order setting the following briefing schedule for Defendants' anticipated motions to dismiss: motions by January 14, 2022; response by February 14, 2022; and replies, if any, by February 28, 2022. Dkt. 120. In that same order, this Court stated that Plaintiffs' response was not to exceed 50 pages and Defendants' replies were not to exceed 15 pages. *Id.*

Since that time, this Court has granted leave to amend the briefing schedule and allowed for additional pages for all parties, due to the length of the First Amended Complaint (over 200 pages) and the complexity of the issues involved in the sixteen counts that it brings. Dkt. 134, 135, 153, 162. The most recent amended briefing scheduling resulted in Defendants submitting their motions on January 28, 2022 and Plaintiffs submitting their response on March 14, 2022. Defendants were allowed 45 pages for their motions and Plaintiffs were granted 75 pages for their response. Dkt. 162.

Plaintiffs' response totals 70 pages. Given the length and complexity of Plaintiffs' response, as well as the difficulty in communications between counsel and Ms. C. Bronfman, who is incarcerated and in the process of being transferred between facilities, Ms. C. Bronfman requests an additional two weeks and 10 additional pages (for a total of **25 pages**) to respond to these issues in her reply. An additional two weeks and 10 pages would allow Ms. C. Bronfman to provide a more organized framework for her reply and permit a more complete discussion of the legal issues at hand.

Counsel appearing for Plaintiffs and the other Defendants consent to Ms. C. Bronfman's requests. Ms. C. Bronfman requests that the same relief be extended to all Defendants. As to the

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request regarding an extension of the page limits, Counsel appearing for Ms. Sara Bronfman joins in that request.

This request is submitted six business days prior to the scheduled deadline. This is Ms. C. Bronfman's first request for an extension of time and first request for leave to file in excess of the Court's page limit concerning her reply. This is Ms. C. Bronfman's second request for an extension of time and second request for leave to file in excess of the Court's page limit in this litigation.

Respectfully,

WILLKIE FARR & GALLAGHER LLP

/s/ Craig C. Martin

Craig C. Martin

Cc: All Counsel by ECF