



10 G Street NE, Suite 600 | Washington, DC 20002

August 4, 2022

ARIA C. BRANCH
abranh@elias.law
D. 202-968-4518

VIA ECF

The Honorable Judge Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *DCCC v. Kosinski, et al.*, Civil Action No.: 22-cv-1029 (RA)

Dear Judge Abrams:

In advance of the status conference scheduled for 4:00 pm tomorrow, counsel for all Parties in the above-referenced action hereby jointly move the Court to stay all further proceedings in this case, including expert discovery, until after the November 8, 2022 general election. Such a stay will solidify the procedures applicable to the upcoming elections, including those required by the Court's July 13 Order, and allow the Board and the other Parties to focus on the election.

If the Court grants this motion, the Parties will file a status report after the November election proposing a schedule for further proceedings.

Respectfully submitted,

/s/ Aria C. Branch

Marc E. Elias*

Aria C. Branch*

David R. Fox*

Joshua L. Harris*

Daniela Lorenzo

ELIAS LAW GROUP LLP

10 G Street NE, Suite 600

Washington, DC 20002

Tel: (202) 968 – 4513

Fax: (202) 968- 4498

melias@elias.law

abranh@elias.law

dfox@elias.law

jharris@elias.law

dlorenzo@elias.law

/s/ Seth J. Farber

Letitia James

Attorney General for the State of New York

Seth J. Farber

Special Litigation Counsel

28 Liberty Street

New York, New York 10005

Counsel for Defendants

Andrew G. Celli, Jr.
Nairuby L. Beckles
**EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP**
600 Fifth Avenue, 10th Floor
New York, New York 10020

Counsel for Plaintiff

**Admitted Pro Hac Vice*

/s/ Tyler Green
Paul DerOhannesian II (PD0523)
DEROHANNESIAN & DEROHANNESIAN
159 Wolf Road, Suite 305 Albany, NY 12207
(518) 465-6420
Fax: (518) 427-0614
paul@derolaw.com

Tyler Green*
Cameron T. Norris*
James P. McGlone*
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22201 (703) 243-9423
tyler@consovoymccarthy.com
cam@consovoymccarthy.com
jim@consovoymccarthy.com

Counsel for Intervenor-Defendants

RETRIEVED FROM DEMOCRACYDOCKET.COM