

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

August 4, 2022

ARIA C. BRANCH abranch@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

abranch@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

Application granted. Given this stay, the status conference scheduled for 4:00 p.m. today will be adjourned sine die unless any party advises chambers by 2:00 p.m. requesting that the conference take place. On or before November 15, 2022, the parties shall submit a status letter proposing next steps in this action.

SO ORDERED.

Hon. Ronnie Abrams

August 5, 2022

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

. /00
Lul (703) 243Lvoymccarthy.com
Lonsovoymccarthy.com
Counsel for Intervenor-Defendants 1600 Wilson Blvd., Ste. 700

Arlington, VA 22201 (703) 243-9423