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May 30, 2019

BY ECF

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: Democratic National Committee v. The Russian Federation (WikiLeaks), 18 Civ. 3501 (JGK)

Dear Judge Koeltl:

This letter is submitted on behalf of defendant Wikileaks, which I represent in the aboveentitled case, and seeks a one-week extension – from June 3, 2019, until June 10, 2019 – of the due date for WikiLeaks' Reply Memorandum of Law in support of WikiLeaks' Motion to Dismiss Plaintiff's Second Amended Complaint. I have spoken with Geoffrey A. Graber, Esq., of Cohen Milstein Sellers & Toll PLLC (Plaintiff's Attorneys), and he has informed me that Plaintiff consents to this application. The reasons for the extension are a concurrent deadline next week for pretrial motions in a criminal case, *United States v. Blondet*, 16 Cr. 387 (JMF), as well as the logistical challenges of timely communication and coordination with lawyers overseas who are handling other pressing recent matters related to WikiLeaks.

Accordingly, it is respectfully requested that the due date for WikiLeaks' Reply Memorandum of Law be extended one week until June 10, 2019.

Respectfully submitted,

Whene T. Klater

Joshua L. Dratel

JLD/