



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-8733

May 31, 2022

By ECF

The Honorable Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

RE: *Upsolve, Inc. v. James*, 22-CV-627 (PAC)

Dear Judge Crotty:

This Office represents the Attorney General in the above-captioned case. The current deadline for the Attorney General to answer or otherwise respond to the complaint is June 3, 2022. *See* 2/01/22 Minute Entry (extending answer deadline until 10 days after decision on Plaintiffs' motion for a preliminary injunction). The Attorney General respectfully requests that this deadline be extended until July 15, 2022.

The complaint in this matter contains 112 paragraphs, and an extension is needed so that the Attorney General can properly respond to the pleaded allegations. An extension is also appropriate given the important public policy issues at stake.

This is the Attorney General's second request for an extension of its time to answer, as this Office also orally requested a stay or extension of that deadline pending disposition of Plaintiff's preliminary injunction motion. Plaintiffs' counsel consents to the requested extension, and simply asked, in return, that the Attorney General consent to Plaintiffs' forthcoming motion to extend the deadline for filing the case management order until July 15, 2022. The Attorney General agrees to this condition.

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Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Matthew J. Lawson

Matthew J. Lawson
Assistant Attorney General