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March 11, 2025

**VIA ECF**

Hon. Jennifer L. Rochon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *In re: Lottery.com, Inc. Sec. Litig.*, 1:22-cv-07111-JLR (S.D.N.Y.)

Dated: March 12, 2025  
New York, New York

  
JENNIFER L. ROCHON  
United States District Judge

Dear Judge Rochon:

We write jointly on behalf of Lead Plaintiffs RTD Bros LLC, Todd Benn, Tom Benn, and Tomasz Rzedzian (“Class Plaintiffs”) and Defendants Lottery.com, Inc., Lawrence Anthony DiMatteo III, Ryan Dickinson, Matthew Clemenson, and Vadim Komissarov (collectively, “Defendants,” and with Class Plaintiffs, the “Parties”) to request: (i) an extension of time for Class Plaintiffs’ forthcoming amended complaint; and (ii) a briefing schedule for Defendants’ motion(s) to dismiss thereto.

On February 25, 2025, the Court granted-in-part and denied-in-part Defendants’ motions to dismiss Class Plaintiffs’ Third Amended Complaint. ECF 223. The Court granted Class Plaintiffs leave to amend within 21 days of the Order, *i.e.*, March 18, 2025. *Id.* The Parties have met and conferred and jointly propose the following schedule for filing of Class Plaintiffs’ amended complaint<sup>1</sup> and Defendants’ anticipated motion(s) to dismiss:

- Class Plaintiffs’ Fourth Amended Complaint (“4AC”) – April 24, 2025
- Defendants’ motion(s) to dismiss the 4AC – June 30, 2025
- Class Plaintiffs’ opposition brief(s) to Defendants’ motion(s) – August 14, 2025
- Defendants’ reply brief(s) – September 17, 2025

We thank the Court’s continued attention to this matter.

<sup>1</sup> This is the first request for extension of this deadline.

Hon. Jennifer L. Rochon  
March 11, 2025  
Page 2

Respectfully submitted,

*/s/ Casey E. Sadler*  
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*Counsel for Class Plaintiffs*

*/s/ Jonathan C. Uretsky*  
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*/s/ Danny C. Onorato*  
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*Counsel for Defendant Anthony DiMatteo*

*/s/ Franklin G. Monsour, Jr.*  
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*Counsel for Defendants Matthew Clemenson  
and Ryan Dickinson*

*/s/ John A. Piskora*  
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*Counsel for Defendant Vadim Komissarov*

cc: All Counsel of Record (via ECF)