



James W. Hundley
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February 18, 2020

Delivered Via First-Class U.S. Mail and Email to dquinn@dyciolaw.com

Danielle Quinn
Dycio & Biggs
10533 Main Street
Fairfax, Virginia 22030

Re: *UWS v. NRA*: Discovery Deficiencies

Dear Ms. Quinn:

I write in response to your letter dated February 13, 2020. Your claim that our responses to UWS' discovery requests are untimely is without merit and need not be addressed further. As a general matter, the NRA continues to assert, and does not waive, any and all of its stated objections in the NRA's Objections and Responses to Plaintiffs' First Set of Interrogatories, Requests for Production of Documents, and Requests for Admissions ("Objections and Responses").

The Objections and Responses speak for themselves. However, we point out that we have agreed to produce information in response to the majority of your requests. We are not required to produce all discoverable material by the deadline for objections and responses to discovery requests. Indeed, your own responses to our requests for discovery are not even close to being substantially complete. The deadline for the completion of discovery is June 19, 2020.

The NRA will prepare and share a privilege log as appropriate for any documents protected from disclosure.

We are available to meet and confer regarding a reasonable timetable for discovery.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Hundley", is written over a horizontal line.

James W. Hundley
BRIGLIA HUNDLEY, P.C.