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October 1, 2019

Carolyn C. Ziogas  
Supreme Court Building  
231 Capitol Avenue  
Hartford, CT 06106

**Re: *State v. Bemer*, AC 43174**

Dear Ms. Ziogas,

Pursuant to P.B. § 63-7, the Defendant requests permission to file a 40-page brief on his appeal.

This is a complicated case requiring an extensive discussion of the facts in support of the Defendant's insufficiency claim. In addition, the Defendant has raised two first impression statutory construction issues concerning the definition of coercion in C.G.S. § 53a-192 for the purpose of sex trafficking. One of these issues also include a detailed discussion of *State v. Kitchens*, 299 Conn. 447 (2011).

The undersigned has done what he can to cut the number of pages as much as possible, and any further cuts would be to the bone.

Very Truly Yours,

Wesley W. Horton,  
Attorney for the Defendant

10/1/19  
The request to file  
a 40 page brief is  
granted.

(Lavone, J)  
Sneeve, deputy chief clerk