

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000
FACSIMILE: +1-212-455-2502

Direct Dial

+1-212-455-3070

E-Mail Address

brooke.cucinella@stblaw.com

BY ECF

November 15, 2021

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY, 10007

Re: *United States v. Ilori*, No. 20-cr-378 (S.D.N.Y.)

Dear Judge Liman:

We represent defendant Adedayo Ilori in the above-captioned action. We write to update the Court regarding our retention of a mental health professional to evaluate Mr. Ilori ahead of the sentencing hearing currently scheduled for December 9 at 3:00 pm. Since we last wrote to the Court, we have identified a mental health professional to evaluate Mr. Ilori. We are still determining logistics and whether we will be moving forward with him or another professional given availability and logistics with evaluating an individual in the New Jersey correctional facility where Mr. Ilori is presently being detained—we are diligently working to finalize an engagement, and will keep the Court updated. We are hopeful not to have to seek another extension (for this reason) and will notify the Court as soon as possible as to when our engagement and logistical issues have been resolved.

With respect to discovery, the Government produced certain discovery on Friday, November 12, 2021. We also learned last week, however, that the Government intends to produce additional discovery ahead of sentencing, specifically asking for a hard drive that could hold 2 TB of data. We are proactively working with the Government to get this discovery produced as soon as possible, and are hopeful that they will provide both a detailed index and an overview as to what they believe to be relevant to sentencing.

We will keep the Court updated on our progress and will inform the Court when we have retained a mental health professional and the status of scheduling an examination of Mr. Ilori, as well as the status of our receipt and review of the discovery we learned about last week.

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November 15, 2021

Respectfully submitted,

/s/ Brooke Cucinella

Brooke Cucinella

cc: Counsel of record (via ECF)