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BY ECF

December 2, 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 on November 15, we have identified and spoken to a mental health expert—specifically, a psychiatrist—to evaluate Mr. Ilori. The expert has agreed to provide his services and we are in the process of retaining him. We intend to submit our request for services other than counsel soon. The expert informed us that he will need until the end of January to evaluate Mr. Ilori and draft a report.

In order to ensure that sufficient time is allotted to complete Mr. Ilori's assessment, we respectfully request that this Court adjourn Mr. Ilori's sentencing date until after February 15, 2022. We recognize that this is a significant adjournment. However, we believe that it is necessary to ensure adequate representation of our client in light of the amount of time the expert stated he needed to conduct Mr. Ilori's evaluation. The Government has consented to this adjournment.

In addition, the Court previously asked for an update on discovery. The Government produced discovery on November 22, 2021 and we received additional discovery today, which we have not yet reviewed. We are waiting for production of any post-arrest statements made by any alleged co-conspirators that could implicate Mr. Ilori. We will keep the Court updated on our progress.

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December 2, 2021

Respectfully submitted,

/s/ Brooke Cucinella

Brooke Cucinella

cc: Counsel of record (via ECF)