



M O S K O W I T Z & B O O K , L L P

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November 3, 2022

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Adedyo Ilori* 21 Cr. 746 (MKV)

Dear Judge Vyskocil:

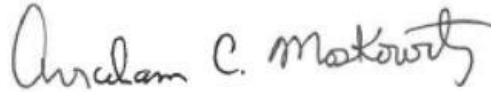
By Order dated November 1, 2022, Your Honor appointed me to represent Mr. Ilori following his conviction at trial on six counts including *inter alia*, major fraud against the United States, wire fraud, aggravated identity theft and conspiracy to commit money laundering. Mr. Ilori was previously represented by Peter Brill. This letter is respectfully submitted on behalf of the defendant, to request that the Court extend the time by which post-trial motions must be filed pursuant to Federal Rules of Criminal Procedure 29 and 33, until December 31 2022. The additional time is needed to enable me to familiarize myself with the facts of the case, review the trial record and the Government Exhibits and consult with the defendant before drafting and filing any potential motions. Although I recognize that the requested extension is a lengthy one, it is necessary because of the crush of other work with deadlines in November and December, including numerous sentencings, an evidentiary hearing on a motion to withdraw a guilty plea. In addition, my current law firm is in the process of disbanding and I am in the process of forming a new firm and moving into new office space, which will require a significant amount of my time over the next two months.

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I have discussed the requested extension with AUSA Murray who informed me that the Government has no objection to the request.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Avraham C. Moskowitz". The signature is written in a cursive, flowing style.

Avraham C. Moskowitz

cc: AUSA Juliana Murray (by email)
AUSA Daniel Felton (by email)