



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

Avraham C. Moskowitz
AMoskowitz@mb-llp.com

345 Seventh Avenue, 21st Floor
New York, NY 10001
Phone: (212) 221-7999
Fax: (212) 398-8835

January 22, 2023

BY ECF / EX PARTE

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

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

Your Honor:

I represent Mr. Adedayo Ilori in the above-referenced matter. I write to request the Court's authorization to have an associate counsel assigned. Because this letter requests permission to expend CJA funds related to the defense, it is submitted *ex parte* pursuant to 18 U.S.C. §§ 3006(A) and 3599(f). This application is necessary for my effective representation of Mr. Ilori.

As the Court is aware, Mr. Ilori is awaiting sentencing following a jury verdict, guilty on Counts 1-6, on November 1, 2022. The proposed associate counsel will assist in all aspects of Mr. Ilori's defense in connection with sentencing, including Mr. Ilori's sentencing submission, which is due on January 17, 2023. Associate Counsel will also assist with Mr. Ilori's appeal, if we continue to represent Mr. Ilori on appeal. The proposed associate counsel is Christopher A. DeGennaro, Esq., who is a mentee in the Eastern District's Mentoring Program. Mr. DeGennaro has many years of trial experience as a state prosecutor and attorney at Foley & Lardner LLP.

The Board of Judges of the Eastern District of New York has implemented a Mentoring Program, which assigns experienced members of the District's CJA Panel to act as mentors for attorneys interested in applying to the Panel. The program is intended to improve the diversity and overall quality of the CJA Panel and is open to all interested and qualified attorneys. The Program is designed to provide those attorneys with federal experience by pairing them with mentors and assigning them to cases that the District Court believes are of sufficient complexity to warrant the services of multiple attorneys. The mentee works under the close supervision of the mentoring attorney and is subject to the approval of the client and the District Judge to whom the case is assigned. The Mentee provides the first 15 hours on a *pro bono* basis, and thereafter may bill at a rate of \$103.00 per hour. Susan Kellman and Michael Hueston are co-Directors of the Eastern District's Program.

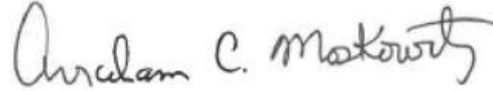
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If this request meets with the Court's approval, I would appreciate if Your Honor would endorse the proposed order, so that I may create an e.voucher and have Mr. DeGennaro begin working on the case.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Avraham C. Moskowitz". The signature is fluid and cursive, with the first name "Avraham" being more prominent.

Avraham C. Moskowitz