

Robert A. Culp  
Attorney at Law  
29 Garrison's Landing  
P.O. Box 550  
Garrison, New York 10524  
(845) 424-4431

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January 28, 2025

**By Email**

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Adedayo Ilori*, 21-cr-746, on appeal, 23-7563 (2d Cir.)

Dear Judge Viskocil:

I was appointed by the Second Circuit as CJA counsel for defendant-appellant Adedayo Ilori in this case. Although I have not appeared in the district court, I respectfully ask the Court to accept this letter requesting that a short transcript excerpt described below be unsealed. Per AUSA Juliana Murray, the government does not object.

Your Honor may recall that at Mr. Ilori's trial, on October 28, 2022, he made a request for new counsel that was denied, but in the course of those deliberations, Your Honor met with Mr. Ilori and his counsel to discuss the application. Because the government was not present, Your Honor directed that the transcript be sealed only for the eyes of the Court and the defense. The sealed pages are at pp. 515-23 of the trial transcript. In Mr. Ilori's appeal that is due on February 10, 2025, we will refer to the sealed pages. On consultation with Mr. Ilori, we agree that fairness dictates that the government be able to see the pages as well. Because the discussion is brief and limited, we believe the pages can be unsealed for all purposes.

AUSA Juliana Murray advises that the government has no objection to the unsealing. For the Court's convenience I will provide the pages in question, but that excerpt will not be sent to the government unless and until this application is granted.

I would be grateful if the Court would endorse this letter or otherwise order granting the application. If the Court has any questions or concerns please do not hesitate to inquire.

Respectfully submitted,

s/Robert A. Culp

Robert A. Culp

Enc.

Cc by email: AUSA Juliana Murray, Esq.(w/o enc)