U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

June 10, 2026

BY ECF (REDACTED) AND EMAIL

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

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

Dear Judge Vyskocil:

The Government respectfully writes, with the consent of defense counsel, Elena Fast, Esq., who has conferred with defendant Adedayo Ilori, to request an adjournment of next week's status conference and the exclusion of time in light of recent [redacted] information, which bears on Ilori's transportation to this District from his current Federal Bureau of Prisons facility at FMC Devens, in Ayer, Massachusetts. Given the "recognized privacy interest in medical records," *United States v. Sattar*, 471 F. Supp. 2d 380, 387 (S.D.N.Y. 2006), the Government respectfully seeks leave to file under seal the portions of this letter discussing non-public [redacted] information.

Ilori's [redacted] information—based on information provided by the Federal Bureau of Prisons and the United States Marshals Service over the past two days—is as follows. On or about April 29, 2026, Ilori received [redacted]. He has a follow-up appointment scheduled with [redacted] within the next two weeks (the "Appointment").[1] The parties agree that, given the stage of these proceedings and for Ilori's [redacted] to attend the Appointment, Ilori's transportation to this District should not commence until after the Appointment. Additionally, later this month, defense counsel is scheduled to [redacted] and will be without [redacted] to attend an in-person Court proceeding from on or about June 30, 2026 through at least on or about July 8, 2026.

In light of the foregoing [redacted] information, the parties respectfully request that the Court adjourn the status conference currently scheduled for June 15, 2026 at 11 a.m. to July 9, 2026 or thereafter. Finally, again with the consent of defense counsel, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from

[1] The Federal Bureau of Prisons, pursuant to its regular policies and practices, has asked that the Government not disclose the exact date of the Appointment to the defendant. Of course, if helpful to the Court, the Government will disclose the exact date (of which the Government is aware) on an *ex parte* basis.

June 15, 2026, through and including the date of the next conference, and submits that an exclusion of time under 18 U.S.C. § 3161(h)(7)(A) would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy retrial because it would allow for the defendant's transportation to this District, new counsel's retrial preparation, including the review of discovery, and the parties to engage in discussions regarding a potential resolution of the matter without the need for a retrial.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/
Connie L. Dang
David R. Felton
Juliana N. Murray
Daniel G. Nessim
Assistant United States Attorneys
(212) 637-2543/ -2299 / -2314 / -2486

cc: Elena Fast, Esq. (by ECF and email)