

AFONSO ARCHIE LAW, P.C.
ATTORNEYS AT LAW

ALBERT M. AFONSO, ESQ. ‡*
TROY A. ARCHIE, ESQ.
KERLIN HYPPOLITE, ESQ.
ANDRE A. NORWOOD JR., ESQ.

ARCHIE@AANJLAW.COM

‡ ALSO MEMBER OF PA BAR
* ALSO MEMBER OF VT BAR

November 14, 2024

VIA PACER

Honorable Karen M. Williams
United States District Court Judge
Mitchell H. Cohen Courthouse
4th And Cooper Streets
Camden NJ 08101-0000

Re: USA v. Adrienne Ponzo, et al
Criminal No.: 24-cr-00267-KMW
Letter Motion for a two week extension to file Pre Trial Motions Nunc Pro Tunc

Dear Judge Williams,,

As the court is aware, the undersigned was appointed to represent Ms. Ponzo in the above referenced matter. Please accept this letter request for an extension in lieu of a more formal motion. The Court recently extended the due dates regarding motion practice in this case due to the defendant's need to engage Cornerstone Legal Consultants to manage the massive amount of discovery turned over to the defendant's by the Government. The Court set January 15, 2025 as the return date for oral argument. I am respectfully requesting an additional two weeks to submit pre-trial motions which I have identified three (3) issues. The most pressing issue and the reason why additional time is needed is the format in which ESI was produced by the Government and will be one of the defendant's arguments in pre-trail motions. I have Cornerstone Legal Consultants working on an affidavit in support of one of Ms. Ponzo's motions and they need additional time and I was tied up litigating another case all day yesterday into this morning, but the following is a preview of same:

“[I]n addition to the duplication in different formats, we found that there was a large zip

file split into 95 parts totaling 2.08 TB. The problem with how this was provided is that the splits of the zip were dispersed across several folders. This caused errors when trying to analyze the contents of the split zip. The 95 parts were saved in different locations on the provided drives. When provided this way the split zip did not open properly. The 2.08 TB of data had to be copied locally into one folder for the split zip to open properly. This added additional time to copy, and quality check the contents. Cornerstone Discovery also received over 3.41 TB of encrypted archive files, that our team examined and determined to be duplicates of provided data in zip format. Our team needed to take time to confirm that this was duplicative to avoid increasing the amount of time needed to review this data. In total Cornerstone received just over 10 terabytes of data. After spending over a month of processing, deduplication, quality checking data, and loading data for a timely review, we have a platform with under 3 TB....”

I corresponded with AUSA Friedman regarding the above and the Government has no objection to this request. Additionally the defendant consents in advance to any request for additional time requested by the Government. We respectfully request that this request be granted in fairness to the defendant and to protect her constitutional rights. Counsel for Mr. Wessel’s joins in this request.

Thank you for your attention and courtesies in this matter.

Respectfully submitted,

/s/ Troy A. Archie, Esq.

cc: Daniel A. Friedman, AUSA
All Defense Counsel