

JOHN L. RUSSO
ATTORNEY AT LAW

COUNSEL
Milton Florez, Esq.
Paul Testerverde, Esq.

J.L. Russo, P.C.
31 · 19 Newtown Avenue, Suite 500
Astoria, New York 11102
Tel: 718 · 777 · 1277
Fax: 718 · 204 · 2310
Email: JLRussoPC@Gmail.com

PARALEGAL
Maria Nunez, B.S.

March 11, 2026

Via E-Mail and ECF
Honorable Robert A. Kirsch
United States District Judge
United States District Court
District Of New Jersey
402 East State Street
Trenton, New Jersey 08608

Re: United States v. Damaris Valerio
Docket No.: 25 CR 00414

Your Honor:

This office represents Damaris Valerio, the defendant in the above referenced matter, which is scheduled for sentencing before the Court on March 17, 2026. We write, in response to the Government's letter of earlier today and the Courts inquiry and directive with regard to an adjournment of sentencing in this matter.

Given the recent opinion of the District Court (Brann, DCJ) which found the current configuration of the U.S. Attorney's Office in New Jersey to be unlawful as constituted, the Defense is not inclined, at this time, to waive any objections thereto. See, *United States v. Naviwala*, Cr. No. 24-00099 [ECF Nos. 317-18], and *United States v. Torres*, Cr. No. 24-378 [ECF Nos. 120-21]. Given the foregoing, we respectfully request an adjournment of sentencing for a period of 45 plus days to a date in late April 2026 convenient for the Court.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,
/s/ John Russo
John L. Russo

JLR:mn
Cc: AUSA Fatima Cano